



ZIBULO COLLIERY: OPENCAST

ANNUAL EXTERNAL ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT (2024 – 2025)

Undertaken in accordance with Section 34 and Appendix 7 of the Environmental Impact Assessment Regulations (GN S82 of 04 December 2014), as amended, Section 24(7)(d) of the National Environmental Management Act (Act 107 of 1988) and Section 55 of the Mineral Resources and Petroleum Development Act (Act 28 of 2002), as amended.

24 – 26 June 2025

DMRE REFERENCES:

17/2/2/2 NK-1 (30 April 2010)

MP/30/5/1/2/2/338 MR (10 January 2010)

MP 30/5/1/2/3/2/1/338 EA (12 February 2020)

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RELATED DOCUMENTS

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0.1	Environmental Authorisation (Ref. 17/2/2/2 NK-1) for Zibulo Colliery: Opencast for the development of an activity, including structures and infrastructure, where the total area of the developed area is, or is intended to be, 20 Hectares or more, on Portions 12,19,39,40 and 41 of the Farm Oogiesfontein 4IS.	30.04.2010
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0.3	Environmental Authorisation (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining extent of Portion 12 of the Farm Klipfontein 3 IS.	12.02.2020
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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, Zibulo 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 annual external environmental performance assessments in accordance with Section 34 and Appendix 7 of the Environmental Impact Assessment (EIA) Regulations (GN 982 of 04 December 2014), as amended, Section 24(7)(d) of the National Environmental Management Act (NEMA) (Act 107 of 1998) and Section 55 of the Mineral Resources and Petroleum Development (MPRD) Act (Act 28 of 2002), to verify the level of compliance with conditions of the Environmental Authorisations (EA) and Environmental Management Programmes (EMPr) issued to its operations.

This report forms part of the annual external environmental performance assessments conducted at Zibulo Colliery (2024 – 2025). The objective was to verify Zibulo Colliery's compliance with conditions of the EAs and EMPrs that remained valid for the annual assessment period (2024 – 2025) and the effectiveness of mitigation measures implemented to manage environmental impacts associated with their authorised activities.

1.1. ZIBULO COLLIERY

Zibulo Colliery is a thermal coal mine comprised of the Zibulo Colliery: Underground, Zibulo Colliery: Opencast and Zibulo Colliery: North Shaft and is located in the north-western margin of South Africa's Witbank Coalfield, in the eMalahleni Local Municipality and Nkangala District Municipality of Mpumalanga (Figure 1). Construction of Zibulo Colliery began in 2008, and mining operations commenced in 2012 in accordance with the Mining Rights issued by the DMRE in terms of the MPRD Act (Act 28 of 2002) for Zibulo Colliery: Underground (30/5/1/2/2/305 MR) and Zibulo Colliery: Opencast (MP 30/5/1/2/2/338 MR).

Zibulo Colliery: Underground currently mines coal from eight sections of the No. 2 Coal Seam by bord and pillar methods and Zibulo Colliery: Opencast extracts coal from the No. 2 and No. 4 Coal Seam using a dragline and truck and shovel methods. The final primary coal product is railed to the Richard's Bay Coal Terminal for export and a portion of the secondary coal product (middling) is sold in the domestic market. The planned Life-of- Mine (LoM) for Zibulo Colliery: Opencast is until 2026, Zibulo Colliery: Underground until 2031 and Zibulo Colliery: North Shaft

extended the LoM until 2038. Zibulo Colliery was previously owned by Anglo American Thermal Coal (Pty) Ltd (AATC), however, following the demerger and transfer of AATC on 04 June 2021, Thungela acquired a 73% interest in Zibulo Colliery and the remaining 27% was attained in November 2022 from Anglo American Inyosi Coal (Pty) Ltd.

1.1.1. Zibulo Colliery: Opencast

Zibulo Colliery: Opencast (previously Zondagsfontein) is located immediately northwest of Ogies on Portions 19, 12, 39, 40, 41 of Oogiesfontein 4 IS and Portion 12 of Klipfontein 3 IS in the eMalahleni Local Municipality and Nkangala District Municipality of Mpumalanga. The site is bordered by the N12 on the north, the R555 to the south and the R545 to the west, with berms in place to divert clean stormwater around the mine for discharge into an unnamed tributary of the Saalklapspruit (refer to Figure 2).

The Mining Right (MP 30/5/1/2/2/338 MR) issued by DMRE on 06 October 2010, covers 203 Ha of the Witbank - Oogies Coalfields and Zibulo Colliery: Opencast mines coal from a Boxcut which is 35 m deep, 1 km long and approximately 67 Ha in extent. Coal is removed from the No. 2 and No. 4 Coal Seam using a dragline, truck and shovel mining methods, and the Run-of-mine (ROM) coal is deposited at the ROM stockpiling area. Raw coal is screened and crushed at the Primary Processing Plant and transported by truck to the beneficiation plant at Phola Plant where it is washed. Dirty stormwater collected around the site is channelled in dirty stormwater drains to the Pollution Control Dams from where it is used in dust suppression at the site or pumped to the eMalahleni Water Reclamation Plant for treatment.

The main activities and facilities at Zibulo Colliery: Opencast include:

- Coal removal from the Boxcut
- ROM Tip area
- ROM, Overburden, Topsoil and Softs stockpiles
- Primary Processing Plant for screening and crushing
- Coal Conveyors
- Two Pollution Control Dams (40 ML and 9ML)
- A Dust Suppression Dam
- Clean and dirty stormwater channels
- Office complex
- Workshops
- Tyre Bay, Diesel Bay and Wash Bay
- Hard Park for machinery
- Security entrance gate
- Buried water pipelines.

Zibulo Colliery: Opencast's EMPr (Ref. MP 30/5/1/2/2/338 EM) was approved by the DMRE on 06 October 2010 in the Mining Right (MP 30/5/1/2/2/338 MR) and an EA (Ref. 17/2/2/2 NK-1) was granted in terms of the (now repealed) EIA Regulations (GN R. 385 of 21 April 21 2006) under NEMA (Act 107 of 1998) by the then, Mpumalanga Department of Economic Development Environment and Tourism (now, Department of Agriculture, Rural Development, Land and Environment Affairs). The EA (Ref. 17/2/2/2 NK-1) authorised the undertaking of mining activities within a seepage wetland system in the southern section and stockpiling of overburden material on the eastern section of Zibulo Colliery: Opencast. An additional EA (Ref. 30/5/1/2/3/2/1/338 EA) and approved EMPr was granted by the DMRE on 12 February 2020 in terms of the EIA Regulations (GN R. 389 of 2014) under NEMA (Act 107 of 1998) authorising the extension opencast mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining extent of Portion 12 of the Farm Klipfontein 3 IS.

Operation of Zibulo Colliery: Opencast commenced in 2012 reaching full production in 2015 at a rate of 1 million tons/ annum. Decommissioning, Closure and Post-Closure has not yet commenced, although concurrent rehabilitation of mined out area is on-going as mining progresses.

This report presents the external environmental Performance Assessment Report compiled by NTC Group (Pty) Ltd for Zibulo Colliery: Opencast (2024 – 2025). The objective was to verify Zibulo Colliery: Opencast's level of compliance with conditions of the EAs and EMPrs that remained valid for the annual period (August 2024 - July 2025), and to determine the effectiveness of mitigation measures implemented to the manage environmental impacts associated with the authorised activities.

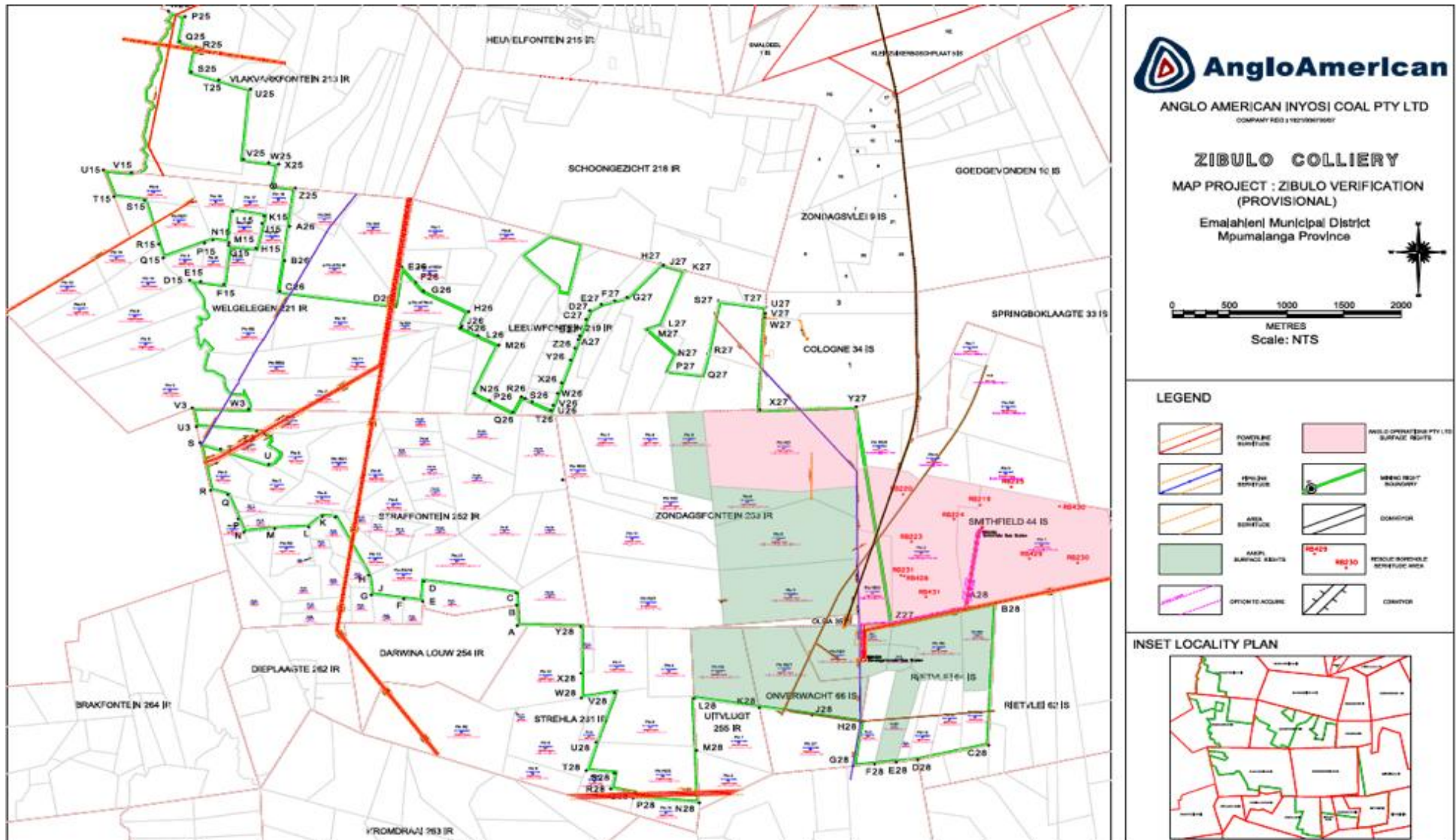


Figure 1: Locality Map of Zibulo Colliery



Figure 2: Zibulo Colliery: Opencast layout (outlined in red)

2. TERMS OF REFERENCE FOR THE PERFORMANCE ASSESSMENT

2.1. MINERAL PETROLEUM RESOURCES DEVELOPMENT ACT (ACT 28 OF 2002)

The performance assessment was undertaken in accordance with Section 55 of the MPRD Act (Act 28 of 2002). Section 55 (1) mandates the undertaking of performance assessments of the appropriateness and adequacy of EMPrs and compiling a PAR which must be submitted to the DMRE. Section 55 (2) states that the frequency for conducting performance assessments must be (i) as stipulated in the EMPr or, (ii) every two years or (iii) as agreed to in writing by the DMRE. Regulation 55(4) requires the performance assessment be conducted by an independent, competent person(s).

The MPRD Amendment Act (Act 49 of 2008) repealed Sections 39 – 42 of the MPRD Act (Act 28 of 2002) and inserted Section 38A to make the DMRE the responsible authority for implementing and approving environmental provisions for mining and related activities in accordance with the NEMA (Act 107 of 1998). The insertion of Section 38B provided that EMPrs approved under the MPRD Act (Act 28 of 2002) before or at the time of the coming into effect of the NEMA (Act 107 of 1998) are deemed to be approved and with an environmental authorisation having been issued.

2.2. ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN R982 OF 04 DECEMBER 2014)

The EIA Regulations (GN R982 of 2014), as amended, published in terms of the NEMA (Act 107 of 1998), regulate the process for preparing, evaluating, and submitting applications for EAs. Section 34 of the EIA Regulations (GN R982 of 2014), as amended, provides the requirements for auditing the compliance with EAs, EMPrs and Closure Plans. Section 34 (1) and (2) requires the holder of an EA to appoint an independent person to conduct an audit of all valid EAs and EMPrs at the intervals specified in the EA and submit an audit report to the Competent Authority.

The audit report must include the information in Appendix 7 and as per Section 34 (3) must contain verifiable audit findings which are presented in a structured approach to indicate the level of compliance with the EAs and EMPrs and the effectiveness of the mitigation measures in the EMPr to manage environmental impacts associated with the authorised activities. In terms of Section 34 (4), if there is insufficient compliance with the conditions of the EA or EMPr, or if mitigation measures in the EMPr for managing environmental impacts are deemed to be inadequate, the audit report must provide recommendations to amend the EMPr to rectify the shortcomings.

Section 34 (5) states that such recommendations must be subjected to a Public Participation Process and Section 34 (6) that ICAPS must be notified on a public website within 7 days of submitting the report to the Competent Authority.

2.3. ZIBULO COLLIERY: OPENCAST ENVIRONMENTAL AUTHORISATION

The EA issued by the DMRE to Zibulo Colliery: Opencast that remained valid for the annual assessment period (August 2024 - July 2025) was assessed in accordance with Section 34 of the EIA Regulations (GN R982 of 2014), as amended:

- i. Environmental Authorisation (Ref. 17/2/2/2 NK-1) for Zibulo Colliery: Opencast dated 30 April 2010 for the development of an activity, including structures and infrastructure, where the total area of the developed area is, or is intended to be, 20 Hectares or more, on Portions 12,19,39,40 and 41 of the Farm Oogiesfontein 4IS.
- ii. Environmental Authorisation (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast 12 February 2020 for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining extent of Portion 12 of the Farm Klipfontein 3 IS.

2.4. ZIBULO COLLIERY: OPENCAST ENVIRONMENTAL MANAGEMENT PROGRAMME

The Environmental Management Program for Zibulo Colliery: Opencast that remained valid for the annual period (August 2024 - July 2025) and was assessed in accordance with Section 34 of the EIA Regulations (GN R982 of 2014), as amended:

- i. Environmental Management Programme (Ref. MP/30/5/1/2/2/338 MR) 10 January 2010 for Zibulo Colliery: Opencast Oogiesfontein.
- ii. Environmental Management Programme (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast 12 February 2020 for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining Extent of Portion 12 of the Farm Klipfontein 3 IS.

2.5. ASSUMPTIONS AND LIMITATIONS

The objective of the annual external environmental performance assessment was to determine Zibulo Colliery: Opencast's level of compliance with the conditions of the EA and EMPr that remained valid for the audit period (August 2024 – July 2025) and the effectiveness of the mitigation measures provided in the EMPr in managing environmental impacts associated with the authorised activities. The following assumptions and/ or limitations are applicable:

- The external environmental performance assessment is a snap-shot representation of the current activities at Zibulo Colliery: Opencast.
- The annual assessment period is from August 2024 to July 2025. Conditions which refer to activities occurring prior to this period are assumed to have been previously assessed and may be deemed as being "Not Applicable".
- Zibulo Colliery: Opencast is currently operational. Conditions which refer to activities in the construction, decommissioning or closure phase may be deemed as being "Not Applicable".
- Due to the nature and extent of Zibulo Colliery: Opencast's current activities, not all areas were visited during the site inspection.

- Zibulo Colliery: Opencast representatives were interviewed and requested to provide information relating to specific activities within their respective areas.
- Procedures/ policies and plans developed by Zibulo Colliery: Opencast specifically were deemed to be appropriately implemented on site, as part of the Environmental Management System.
- Conditions which refer to outdated/ repealed legislation or referenced guideline documents were substituted for with the current/ relevant legislation or referenced guideline documents as applicable.

3. PERFORMANCE ASSESSMENT DETAILS

3.1. ASSESSMENT 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 team that participated in the performance assessment at Zibulo Colliery: Opencast are provided in Table 1. The declaration of the auditor’s independence is attached in Appendix A and the Curriculum Vitae for the auditors are attached in Appendix B.

Table 1: Details of the Assessment Team

ROLE	RESPONSIBLE PERSON	CONTACT DETAILS
LEAD AUDITOR	Teboho Motinyane holds an MSc in Environmental Science and has over 20 years of experience as an Environmental Manager in the coal mining sector. He is a member of the South African Council for Natural Scientific Professions and is a certified ISO 14001 EMS auditor. Throughout his career, Teboho has successfully led and managed a wide range of environmental and land management projects in the coal mining sector. Teboho was responsible for conducting the site inspection and reviewing the audit report.	Tel: +27 11 462 2022
		Email: teboho@ntcgroup.co.za
LEAD AUDITOR	Raisibe Mabiza (Pr.Sci.Nat) is an Environmental Scientist contracted to NTC Group (Pty) Ltd. She has over 10 years’ experience in the Environmental field inclusive of experience in the mining sector. Raisibe was responsible for conducting the site inspection, compiling the audit report and reviewing the supporting documentation.	Tel: +27 11 462 2022
		Email: raisibe@ntcgroup.co.za
AUDITOR	Asanda Shobede holds a BSS in Geography and Environmental Management. She is a proactive and detail-oriented young professional with two years of experience in administration, demonstrating strong organizational and communication skills. Adept at managing office operations, coordinating schedules, and supporting team projects to ensure seamless workflow. Asanda was responsible for conducting the site inspection.	Tel: +27 11 462 2022
		Email: asanda@ntcgroup.co.za

3.2. METHODOLOGY

3.2.1. Document Review

NTC Group (Pty) Ltd reviewed the conditions of the EA (see 2.3.) and EMPr (see 2.4.) issued to Zibulo Colliery: Opencast and compiled a Request for Information (RFI) document which listed the documents and records required from Zibulo Colliery: Opencast to verify compliance with the

conditions of the EA and EMPr. The RFI was submitted to Zibulo Colliery: Opencast and the requested information was availed to the auditors via Thungela’s online share point platform (Microsoft Box). The list of documents reviewed during the performance assessment are provided in Section 8. References.

A checklist was created verbatim of the conditions of the EA and EMPr issued to Zibulo Colliery: Opencast and was used to assess the level compliance. The numbering of conditions in the checklists correspond with the conditions of the EA and EMPr to allow for ease of reference.

3.2.2. Site Assessment

A site assessment was conducted on 24 – 26 June 2025 and was attended Teboho Motinyane (NTC), Raisibe Mabiza (NTC), Asanda Shobede (NTC), Kenneth Mokoena (Zibulo Colliery) and Caroline Pepermans (Pinsent Masons). During the site inspection, Zibulo Colliery: Opencast personnel were interviewed, and facilities/ construction areas were inspected.

3.3. COMPLIANCE CRITERIA

NTC Group (Pty) Ltd assessed the conditions of the EA and the EMPr using the criteria provided in Table 2. The approach to the external environmental performance assessment was guided by the requirements of ISO 19011: 2018 “*Guidelines for Auditing Management Systems*”.

Table 2: Performance Assessment Criteria

CRITERIA	ACC	DESCRIPTION
COMPLIANT	C	Full Compliance is when the current construction, operational, or decommissioning activities comply with the authorisation conditions. Mitigation measures or commitment thereof have been achieved and evidence is provided in the form of a document or condition implementation onsite. No mitigation measures are required where operations comply.
NON-COMPLIANT	N/C	Non-Compliance is when construction, operational, or decommissioning activities are in contravention of the conditions and/or have the potential to impact the environment in a detrimental manner. Non-compliance may also be associated with activities breaching legislation/ Mitigation measures or commitment thereof have not been achieved and evidence is not provided in the form of a document or condition implementation onsite. Non-Compliance findings have a high priority and mitigation measures are mandatory.
NOT APPLICABLE	N/A	Not Applicable is assigned to authorisation/ permit conditions where activities no longer occur, that do not apply to current activities, that may be incorrect and require amendment, fall outside the audit period and/or are duplicates of existing conditions.
TAKE NOTE	T/N	In certain instances, conditions are presented in a manner which cannot be assessed as a Compliant or Non-Compliant Condition. This is a specific requirement which the Competent Authority may stipulate, which is applicable to the site and should be considered in the near future, or which allows the Competent Authority certain allowances.

3.4. SCOPE

The scope of the external environmental performance assessment includes:

- The requirements of Section 34 and Appendix 7 of the EIA Regulations (GN R982 of 2014), as amended.
- Section 55 of the MPRD Regulations (GNR 527 of 2004), as amended.
- The conditions provided in Zibulo Colliery: Opencast's EA (see 2.2.) and EMPr (see 2.3.) that remained valid for the annual assessment period.
- Activities associated with the construction phase for Zibulo Colliery: Opencast.
- The annual assessment period from August 2024 - July 2025.
- The property boundaries of the Zibulo Colliery: Opencast shown in Figure 2.

4. PERFORMANCE ASSESSMENT RESULTS

This section provides the results of external environmental performance assessment for the annual period from August 2024 to July 2025. Conditions of the EA and EMPr were assessed using the performance assessment criteria in Table 2. The results for Zibulo Colliery: Opencast's level of compliances with the conditions of the EA are provided in Table 3 and Table 5 and the EMPr in Table 4 and Table 6 as follows:

TABLE 3.	Environmental Authorisation (Ref. 17/2/2/2 NK-1) for Zibulo Colliery: Opencast dated 30 April 2010 for the development of an activity, including structures and infrastructure, where the total area of the developed area is, or is intended to be, 20 Hectares or more, on Portions 12,19,39,40 and 41 of the Farm Oogiesfontein 4IS.
TABLE 4.	Environmental Management Programme (Ref. MP/30/5/1/2/2/338 MR) 10 January 2010 for Zibulo Colliery: Opencast Oogiesfontein.
TABLE 5.	Environmental Authorisation (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast 12 February 2020 for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining extent of Portion 12 of the Farm Klipfontein 3 IS.
TABLE 6.	Environmental Management Programme (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast 12 February 2020 for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining Extent of Portion 12 of the Farm Klipfontein 3 IS.

TABLE 3: ENVIRONMENTAL AUTHORISATION FOR THE DEVELOPMENT OF AN ACTIVITY, INCLUDING STRUCTURES AND INFRASTRUCTURE, WHERE THE TOTAL AREA OF THE DEVELOPED AREA IS, OR IS INTENDED TO BE, 20 HECTARES OR MORE, ON PORTIONS 12,1G,3G,40 AND 41 OF THE FARM OOGIESFONTEIN 4IS GRANTED ON 30 APRIL 2010 WITH REFERENCE NO. 17/2/2/2 NK-1

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3. SCOPE OF THE AUTHORISATION			
3.1	Authorisation of the activity is subject to the conditions contained in this authorisation, which form part of the environmental authorisation and are binding on the holder of the authorisation.	T/N	Zibulo Colliery: Opencast Mining appointed an Environmental Superintendent to bear overall responsibility for giving effect to the conditions of the Environmental Authorisation (EA) (DARDLEA REF. 17/2/2/2 NK-1) and ensure compliance. Additionally, Zibulo Colliery appoints an independent external auditor to conduct annual audits to verify compliance with the conditions of their EAs and Environmental Management Programmes (EMPRs). The auditors were provided with the most recent audit report, " <i>Thungela Zibulo Colliery: Opencast, Annual External Environmental Performance Assessment Report (2023 - 2024)</i> " (January 2024) compiled by NTC Group (Pty) Ltd. Non-compliances with conditions of the EA identified during the audit are managed according to Zibulo Colliery's " <i>Incident and Non-Conformance Reporting Procedure</i> " (Doc No. ZIB-ENV-PRO-0814 , dated 10 November 2017), by logging the incident onto the Environmental Management System Electronic Database (ENABLON) and assigning corrective and preventative actions, target dates and responsible persons for addressing the incident.
3.2	The holder of the authorisation must ensure 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 authorization.	T/N	The " <i>Zibulo Competency Training and Authority Procedure</i> " (Doc No. ZIB-ENV-PRO-0805, dated 10 October 2017) mandates employees, permanent, long term and medium term contract staff, and those returning from annual leave to attend annual site induction prior to commencing work on site. The " <i>Zibulo Environmental Induction</i> " (Doc No. V5) was availed to the auditors and provides requirements regarding environmental good practice and topics related to the EA and EMPr conditions. Additionally, the Thungela Zibulo Colliery Induction Schedule 2025 - Register dated 19 May 2025 was verified by the auditors.
3.3	The activity which is authorized may only be carried out at the property indicated above.	C	Zibulo Colliery: Opencast Mining is currently in the operational phase, and all related activities are undertaken on the properties authorised in the EA (DARDLEA REF. 17/2/2/2 NK-1), as verified by the auditors during the site inspection. No activities were observed outside of the properties approved in the EA: Portions 12, 19, 39, 40, and 41 of the Farm Oogiesfontein 4 IS.
3.4	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 authorization in terms of the regulations.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. No changes to, or deviations from the project description occurred during the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.5	This activity must commence within a period of two (2) years from the date of issue. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.6.	This authorization does not negate the holder of the authorization, responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	T/N	The requisite EA (DARDLEA REF. 17/2/2/2 NK-1) in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) for activities undertaken by Zibulo Colliery: Opencast Mining operation has been obtained, and no unauthorised activities were observed during the site inspection. Zibulo Colliery: Opencast Mining water use activities have been authorised by the Department of Water and Sanitation (DW&S) in terms of Section 21 of the National Water Act (NWA) (Act 36 of 1998) and Water Use Licences: WUL Ref. 04/B20G/AGJ/809 (dated 17 May 2011, as amended 22 January 2016), WUL Ref. 06/B20G/CI/7532 (dated 08 May 2018) and WUL Ref. 06/B20G/GJ/11633 (30 May 2022) have been issued for the opencast mining operation.
APPEAL OF THE AUTHORISATION			
3.7	The holder of the authorisation must notify every registered interested and affected party, in writing and within 10 (Ten) calendar days of receiving notice of the Department's decision to authorize the activity.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.8. The notification referred to in 3.7 must:-			
3.8.1	specify the date on which the authorisation was issued;	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.8.2	inform the interested and affected party of the appeal procedure provided for in Chapter 8 of the regulations; and	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.8.3	advise the interested and affected party that a copy of the authorisation and reasons for the decision will be furnished on request.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
COMMISSIONING AND OPERATION OF THE ACTIVITY			
3.9	Fourteen (14) days written notice must be given to the Department that the activity will commence. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.10	All construction activities must be limited to the said site. No activities must be allowed on adjacent agricultural land.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.11	Chemical toilets must be provided to be used by construction workers. These must be serviced on a regular basis and no pit latrines are allowed.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.12	Potable water must be made available for site workers.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.13	Proper waste management facilities must be provided as part of the construction camp. No dumping of any kind of waste (domestic, general, building rubble, etc) must take place on the adjacent agricultural land.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.14	Noise must be within the environmental noise limits as prescribed by the Environment Conservation Act and other regulations.	NC 001	<p>The ECA (Act 73 of 1989) provides the requirements for environmental noise monitoring of disturbing noise and nuisance noise in accordance with the National Noise Control (NCC) Regulations (GN R154 of 10 January 1992) and using the methodology in SANS 10103: 2008: The Measurement and Rating of Environmental Noise with Respect to Annoyance and to Speech Communication. Furthermore, where noise levels exceed the limits in the NNC Regulations (GN R154 of 1992), the noise source must be identified and mitigation measure must be implemented.</p> <p>Although Zibulo Colliery undertakes occupational noise monitoring and monitoring in terms of ground vibration and air blast, this does not meet the requirements of the recommended Environmental Noise Monitoring in terms of the NCC Regulations (GN R154 of 1992) under the ECA (Act 73 of 1989). In this regard, although there is no legal requirement to undertake environmental noise monitoring, the only manner within which to verify compliance with the prescribed limits is to undertake an environmental noise assessment, even on a once off basis.</p>
3.15	A noise survey must be done and approved by Inspection authority and Occupational Hygienist once installation of the plant is complete.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). A baseline noise assessment survey was undertaken in 2006 and an Environmental Noise Assessment undertaken in respect of the opencast mining operations and conveyor during 2012. However, none of the reports were provided to the auditors for verification.
3.16	The contractor doing civil work must ensure that the disposal of the construction waste is done at the relevant registered municipal waste site and hazardous waste must be disposed of at Holfontein.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.17	Other relevant approvals from legislations, policies and or guidelines of any sphere of the government that are applicable must be considered before construction activities.	T/N	<p>The requisite EA in terms of the NEMA (Act 107 of 1998) for activities undertaken by Zibulo Colliery: Opencast Mining has been obtained, and no unauthorised activities were observed during the site inspection. Water use activities have been authorised by the DW&S in terms of Section 21 of the NWA (Act 36 of 1998) and Water Use Licences have been issued for the opencast mining operation.</p> <p>Zibulo Colliery implements and maintains a certified Environmental Management System (EMS) (ISO 14001: 2015), verifying its commitment towards compliance with environmental legal and other requirements. Annual surveillance/ certification audits requires the site to demonstrate identification and compliance with applicable legal and other requirements, as well as undertaking environmental legal compliance audits at least every 3 years.</p>
3.18	Anglo Coal is responsible for the removal and appropriate disposal at a landfill site of all maintenance waste produced during the operational phase.	C	<p>Zibulo Colliery: Opencast Mining manages waste in accordance with the "Zibulo Colliery Waste Management Procedure" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste disposal and records keeping. General waste is collected by Fortchportch (Pty) Ltd, who hold a Certificate of Approval issued by Emalahleni Local Municipality Environmental and Waste Management (Permit number. Env 001/2025, dated 22 January 2025). Hazardous waste is collected by Fortchportch (Pty) Ltd - COD to be disposed of at Holfontein and a Safe Disposal Certificate (certificate no. 240906000100002826663, dated 30 January 2025) was provided to the auditors for verification. Holfontein is a licenced Hazardous Waste Disposal Facility, as verified in the "<i>Waste Management Licence for Enviroserv Holfontein Hazardous Waste Disposal Facility</i>" (Licence No. 12/9/11/L975/3 dated 30 May 2013) issued by Department of Environmental Affairs. General waste is disposed at Phola Landfill Site, a licenced Waste Disposal Facility.</p>
3.19	A detailed waste management strategy must be established and implemented.	C	<p>Zibulo Colliery: Opencast Mining manages waste in accordance with the "<i>Zibulo Colliery Waste Management Procedure</i>" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste separation at source, the use of colour coded waste receptacles with signage indicating the waste type, waste disposal and records keeping. Good waste management and housekeeping was observed at the site during the inspection.</p>
3.20	Best waste management practices must be emphasized during the induction phase and on an ongoing basis.	C	<p>The "<i>Zibulo Competency Training and Authority Procedure</i>" (Doc No. ZIB-ENV-PRO-0805, dated 10 October 2017) mandates employees, permanent, long term and medium term contract staff, and those returning from annual leave to attend annual site induction prior to commencing work on site. The "<i>Zibulo Environmental Induction</i>" (Doc No. V5) was availed to the auditors and includes waste management as one of the training topics. Additionally, monthly environmental topics are distributed to agents, subcontractors and employees and a copy of the November monthly topic which focused on Waste Management was provided to the auditors for verification. Further to that, Zibulo Colliery manages waste in accordance with the "<i>Zibulo Colliery Waste Management Procedure</i>" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste separation at source, the use of colour coded waste receptacles with signage indicating the waste type, waste disposal and records keeping.</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.21	Waste must be removed by a licensed waste disposal company.	C	Zibulo Colliery: Opencast Mining manages waste in accordance with the "Zibulo Colliery Waste Management Procedure" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste disposal and records keeping. General waste is collected by Fortchportch (Pty) Ltd, who hold a Certificate of Approval issued by Emalahleni Local Municipality Environmental and Waste Management (Permit number. Env 001/2025, dated 22 January 2025). Hazardous waste is collected by Fortchportch (Pty) Ltd - COD to be disposed of at Holfontein and a Safe Disposal Certificate (certificate no. 240906000100002826663, dated 30 January 2025) was provided to the auditors for verification. Holfontein is a licenced Hazardous Waste Disposal Facility, as verified in the "Waste Management Licence for Enviroserv Holfontein Hazardous Waste Disposal Facility" (Licence No. 12/9/11/L975/3 dated 30 May 2013) issued by Department of Environmental Affairs.
3.22	Once the designated areas for waste skips and the planned amounts have been finalized, the mine has to obtain a Section 20 application from the DWAF in terms of the Environmental Conservation Act (Act No. 73 of 1989).	T/N	Section 20 of the Environment Conservation (ECA) (Act 73 of 1989) has been repealed and the requirement for a Waste Management Licence is provided in National Environmental Management: Waste Act (NEMWA) (Act 59 of 2008). A Waste Management Licence is not currently required in relation to the activities undertaken at Zibulo Colliery's opencast mining operations.
3.23	Anglo Coal must ensure that the material generated during the decommissioning phase is cleared from the site and disposed of at a registered landfill site.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.24	Topsoil and subsoil are to be stockpiled separately in the vicinity of the source of the soil and clearly identifiable.	C	Stockpiling of topsoil is managed in accordance with the " <i>Thungela Resources Rehabilitation Guideline</i> " (Doc No. TR.TECH.TS.025.GL.1, dated 01 December 2021), by stripping the topsoil layer and removing this to the designated topsoil stockpiling area.
3.25	Prior to the removal of the soils for stockpiling additional sampling and analysis of the soils must be undertaken, to determine their suitability for use during rehabilitation.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.26	Topsoil and subsoil must be sprayed with dust allaying agent immediately after being stockpiled.	NC 002	Zibulo Colliery: Opencast Mining implements water spraying using water bowsers and enforcing speed limits on site to reduce and manage dust generation. However, Zibulo Colliery: Opencast Mining does not spray topsoil and subsoil with a dust allaying agent immediately after being stockpiled.
3.27	Rapid growth of vegetation on stockpiles must be promoted.	NC 003	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During site inspection, it was observed that only the topsoil stockpiles are revegetated. The rest of the stockpiles and berms are not revegetated.
3.28	The mine must ensure that all erosion control measures are included in the designs of all linear infrastructures (railway lines, power lines, conveyors, pipelines etc.) and points of water discharge.	C	It was observed during the inspection that erosion control measures such as berms, energy dissipaters and vegetation stabilisation along certain infrastructure have been incorporated into the designs of linear infrastructure (including railway lines, power lines, conveyors, and pipelines) as well as at points of water discharge.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.29	Areas where erosion control measures have been implemented must be inspected on a weekly basis to determine their effectiveness.	C	Zibulo Colliery: Opencast indicated that regular inspections are conducted to check for erosion. The following inspection reports were provided to the auditors: <i>Thungela 9 MegL Dam Monthly Inspection Supporting Document</i> , dated 18 November 2024, <i>Thungela 40 Meg Dam Monthly Inspection Supporting Documents</i> , dated 18 November 2024, <i>Thungela 9 Meg Litre Dam Monthly Inspection Supporting Document</i> , dated 06 February 2025, and <i>Thungela 40 Meg Dam Monthly Inspection Supporting Documents</i> , dated 06 February 2025. The monthly Environmental Inspections which are conducted by the environmental team.
3.30	Vegetation establishment in disturbed areas must be undertaken as soon as practically possible, with the growing season and water availability being the primary constraints.	C	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) which provides the requirements for vegetation establishment. According to the " <i>Draft 2024 Pre-grass Rehabilitation Surveys</i> " (dated 29 March 2024), regrassing was scheduled for November 2024. Zibulo Colliery: Opencast indicated that Grassing is undertaken as part of the concurrent rehabilitation.
3.31	An incident management system including procedures and training must be put in place in order to deal with incidents.	C	Zibulo Colliery's " <i>Incident and Non-Conformance Reporting Procedure</i> " (Doc No. ZIB-ENV-PRO-0814 , dated 10 November 2017), was availed during the audit and provides the process for the management and reporting of incidents. The procedure states that incidents must be logged onto the Environmental Management System Electronic Database (ENABLON), assigned with corrective and preventative actions, target dates and responsible persons for addressing the incident.
3.32	Major spillage incidents must be reported to the DME, DWAF, MDALA and the National Department of Agriculture (NDA).	T/N	The Zibulo Colliery: Opencast Mining reported that no significant, reportable pollution incidents occurred at the opencast operations during the audit period (August 2024 - July 2025).
3.33	If spills do occur and soils become contaminated, the appropriate remedial measures must be identified in consultation with appropriate qualified specialists.	NC 004	The " <i>Zibulo Colliery Emergency Preparedness Procedure</i> " (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, hazardous chemical spillages were observed at several areas at the site. - Hydrocarbon spills were observed on the ground with no evidence of spill clean-up measures at the oil drums storage area. An oil leak was also observed at the flanges of the bund overflow pump due to inadequate tightening.
3.34	Contractor Lay Down Area needs to be established within designated mining areas, or where the footprint of the area will become part of the mining infrastructure (i.e. co-disposal facility area and opencast mining areas).	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.35	Should any rare or endangered species be found within the Expansion Project area, these must be relocated under the guidance of MDALA.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.36	Water sprays must be used in the loading of stockpiles.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.37	All employees must be made aware of all environmental issues during induction and must continuously be updated of all new issues.	C	The "Zibulo Competency Training and Authority Procedure" (Doc No. ZIB-ENV-PRO-0805, dated 10 October 2017) mandates employees, permanent, long term and medium term contract staff, and those returning from annual leave to attend annual site induction prior to commencing work on site. The "Zibulo Environmental Induction" (Doc No. V5) was availed to the auditors and provides requirements regarding environmental good practice and topics related to the EA and EMPr conditions. The Thungela Zibulo Colliery Induction Schedule 2025 - Register dated 19 May 2025 was verified by the auditors. Additionally, monthly environmental topics are distributed to agents, subcontractors and employees and a copy of the environmental topic for August 2024, February 2025 and May 2025 were provided to the auditors for verification.
3.38	Clean and dirty water systems around all infrastructures must be implemented prior to the commencement of construction activities to mitigate and reduce impacts on the groundwater aquifers.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
3.39	All pollution control dams and other dirty water infrastructure must be lined with a HDPE liner.	C	During the site inspection, it was observed that both the 9 ML and 40 ML PCD's were lined with a HDPE liner and the dirty water channels were concrete lined.
3.40	All pollution control dams must be maintained regularly to ensure their effectiveness (i.e. removal of silt).	NC 006	Zibulo Colliery: Opencast Mining reported that all PCD are lined and monthly water dam inspections are conducted to assess key aspects that influence the effectiveness of the pollution control dams. The following reports were provided to the auditors: <i>Thungela 9 MegL Dam Monthly Inspection Supporting Document</i> , dated 18 November 2024, <i>Thungela 40 Meg Dam Monthly Inspection Supporting Documents</i> , dated 18 November 2024, <i>Thungela 9 Meg Litre Dam Monthly Inspection Supporting Document</i> , dated 06 February 2025, and <i>Thungela 40 Meg Dam Monthly Inspection Supporting Documents</i> , dated 06 February 2025. The pollution control dams are further inspected during the monthly Environmental Inspections which are conducted by the environmental team. Additionally, a Bathymetric Survey was conducted by Kago Entle Group and the results thereof were documented in the report titled <i>Bathymetric surveys and orthophoto mapping of Thungela Dams</i> , dated April 2025. The aforementioned survey's main purpose is to provide actionable insights for dam management, environmental compliance and infrastructure planning to assist in ensuring that the PCD's maintain their effectiveness. However, it was observed during the site inspection and reported in the Bathymetric survey that the 9 ML PCD is heavily silted, resulting in overgrowth of weeds. This undermines the abovementioned measures implemented to maintain the effectiveness of the PCD (i.e. the monthly inspections and bathymetric survey).
3.41	No activities associated with hydrocarbons and or chemicals (i.e. wash bays etc.) must be undertaken outside of an effectively designed and contained area.	NC 004	During a site inspection at the Workshop Area, a plastic hydrocarbon container was observed stored outside a bunded area or drip tray.
3.42	Spill cleanup kits must be made available at each area where hydrocarbons are being utilized.	C	Spill kits were observed during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.43	The construction of borrow pits, stockpiles and pollution control dams must be done within the mining rights area and be within designated areas.	C	Zibulo Colliery's opencast mining is currently in operational phase, and all related facilities and activities are undertaken on the properties authorised in the Mining Right and EA (DARDLEA REF. 17/2/2/2 NK-1), as verified by the auditors during the site inspection. No activities or facilities were observed outside of the approved properties.
3.44	Ongoing ambient and PM10 monitoring must be implemented with dust monitors concentrated of the west of the site.	C	An ambient and PM10 monitoring programme is in place at Zibulo Colliery: Opencast. The "Gravimetric Dust Fallout Monitoring Report" (Doc Ref. 22-1734-ECOI), compiled by EcoE Innovative Consulting, were availed for the months between August 2024 - April 2025. Three of the four monitoring points, inclusive of the monitoring point located west of opencast were found to be compliant in terms of the non-residential limit of 1 200 mg/m ² /day. However, the monitoring point located south of the opencast at the Police Station recorded four exceedances of the residential limits during the months of August 2024, September 2024, October 2024 and November 2024 which is a non-compliance as per the National Dust Control Regulations. An investigation was conducted that attributed the exceedances to extensive cultivation on close by agricultural land and significant road upgrades nearby. Additionally, PM10 and PM2.5 monitoring was conducted by EcoE Innovative Consulting with the monitoring station placed at Ogies School. PM10 monitoring reports for the months of July 2024 to September 2024 (Doc Ref: 22-1734-ECOI-PM) and December 2024 reports were provided to the auditors. The July 2024 to September 2024 reports indicate that no data was captured for the months due to vandalism of the unit and that the unit is awaiting relocation to a more secure site. The December 2024 report indicates a 47.9% data capture because the unit went offline due to unknown causes, resulting in incomplete data for the period.
3.45	All vehicles must use the limited speed of 40km per hour, especially during the high-risk periods of high winds; high temperature and low humidity.	C	Speed signs indication the 40km/hour limit are placed strategically around the mine. The speed limit is enforced at the mine.
3.46	Consultation and cooperation with local law enforcement agencies must be established to ensure that legal and regulatory compliance on the roads is adhered to.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. Zibulo Colliery: Opencast Mining reported that consultation and cooperation with local enforcement is on-going and no road related legal compliance issues occurred for the audit period (August 2024 - July 2025).
3.47	Gravel roads, topsoils and subsoils must be sprayed with a dust allaying agent immediately after being stockpiled.	NC 002	Zibulo Colliery: Opencast Mining implements water spraying using water bowsers and enforcing speed limits on site to reduce and manage dust generation. However, Zibulo Colliery: Opencast Mining does not spray topsoils and subsoils with a dust allaying agent immediately after being stockpiled.
	Topsoils and subsoils must be sprayed with a dust allaying agent immediately after being stockpiled.	NC 002	Zibulo Colliery: Opencast Mining implements water spraying using water bowsers and enforcing speed limits on site to reduce and manage dust generation. However, Zibulo Colliery: Opencast Mining does not spray topsoils and subsoils with a dust allaying agent immediately after being stockpiled.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.48	Should any graves or other sites with potential historical and/or cultural importance be identified, all activities in that vicinity must cease immediately.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.49	Graveyards must be demarcated with brick walls or with fences and the mine must remain responsible for their future unaffected existence.	N/A	There are no graves within the Zibulo Opencast footprint.
3.50	A forensic archaeologist or reputable undertaker who is acquainted with the administrative procedures and relevant legislation must be involved whenever human remains are exhumed and relocated.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.51	If there are any land claims submitted to the Department of Land Affairs, in terms of the Restitution Act commencement of mining activities must cease until the claim is resolved or finalise, and proper procedures and processes of the legislation must be followed when dealing with the claim.	T/N	No land claims have been submitted to the Department of Land Affairs during the audit period (August 2024 - July 2025).
3.52	Surrounding property owners must be informed of the blasting procedures and schedules and blasting times must be planned in advance and must be clearly indicated on the mining area.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. Zibulo Colliery: Opencast Mining reported that no landowners reside in proximity of the operations.
3.53	Employees and outside contractors must be informed of the blasting procedures and the associated safety measures during induction.	C	The " <i>Zibulo Environmental Induction</i> " (Doc No. V5) was availed to the auditors and provides requirements regarding blasting activities.
3.54	During construction and operation, haulage roads must be treated with Dust-aside or a similar product to reduce water usage and dust creation.	NC 007	Zibulo Colliery: Opencast Mining implements water spraying making use of bowsers using water from the 1 MI Dam PCD and enforcing speed limits on site to reduce and manage dust generation. However, the water used is not treated with Dust-aside or a similar product.
3.55	Before construction commences, representatives from the local authority and community-based organizations, as well as neighbouring residents must be informed of the details of the construction company, size of the workforce and construction schedules.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.56	Construction workers must be easily identified as part of the construction team by wearing the specific clothing and/or name tags.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.57	Pro-active measures must be put in place by the Emalahleni Local Municipality and DCM to minimize negative impacts associated with the influx of	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	construction workers and potential job seekers to the area.		
3.58	The local municipality and local residents must be pro-actively informed of any road closures and diversions.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.59	The Expansion Project must link with the Integrated Development Plan (IDP) of the Emalahleni Local Municipality especially with regards to the planning processes to ensure adequate water supply and other programmes.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.60	Provide opportunities for local businesses to become involved at the start of the procurement process and by allowing them to form part of the tender process.	C	The " <i>Thungela Social and Labour Plan, Zibulo Colliery (Ogiesfontein) (MP) 30/5/1/2/2/338 MR (2021 - 2025)</i> " was availed to the auditors. The Zibulo Colliery Social Labour Plan (SLP) provides Thungela's strategies for promoting inclusive procurement and increase spending with BBBEE-compliant, Black Owned, Black Women Owned and Black Youth Owned, companies, especially Small, Medium, and Micro Enterprises (SMMEs).
3.61	The recruitment process and policy of the mine must be widely communicated to also limit the influx of potential job seekers.	C	Zibulo Colliery: Opencast Mining indicated that the recruitment process and policy is widely communicated through the Job Opportunities page on the Thungela website.
3.62	A skills development programme must be embarked upon before the mine is fully operation to ensure that local people are "employed".	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.63	Access roads and entrances to the mining area must be carefully planned to limit any intrusion, impacts, noise and dust pollution, as well as to limit any risks of accidents	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
3.64	Ensure access points comply with standards and are well marked and indicated.	C	During the site inspection, adequate signage was observed at access points.
3.65	HIV/AIDS awareness and support programmes or groups must be established and implemented with specific focus on those in and nearby the construction camps.	C	The " <i>Thungela Inyosi Coal Social and Labour Plan (2021 - 2025) Zibulo Colliery (MP) 30/5/1/2/2/338 MR (Ogiesfontein)</i> " was availed to the auditors and makes provision for employees and contractors to be made aware of the issues surrounding the spread of HIV and AIDS in the area. Additionally, Zibulo Colliery: Opencast Mining undertakes continuous HIV awareness and training using targeted posters and training material, which were provided to the auditors during the audit.
3.66	Construction vehicles and those transporting materials and goods must be inspected to ensure that these are in good working conditions.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.67	An environmental Committee must be established and used as a forum to keep interested and affected parties informed of the significant environmental aspects identified through the Environmental Impact Report and Environmental Management Plans.	C	Zibulo Colliery: Opencast Mining indicated that an Steercom has been established where significant environmental impacts arising from the mining activities are discussed. The outcomes of these discussions are presented to Interested and Affected Parties (I&APs during future forum.
GENERAL			
3.68	A copy of this authorization must be kept at the property where the activity will be undertaken. The authorization must be produced to any authorized 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 authorization who works or undertakes work at the property.	C	A hard copy of the EA was available during the audit and an electronic copy is available on Zibulo Colliery's Shared Drive.
3.69	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 applicant knows the new details.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. No changes to contact details, responsible person, physical/ postal address, telephonic details, or transfer of this EA occurred for the audit period (August 2024 - July 2025).
3.70	The holder of the authorization must notify the Department, in writing and within 24 (twenty-four) hours, if conditions of this authorization are not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non-compliance.	NC 008	Although Zibulo Colliery appoints an independent external auditor to conduct annual audits to verify compliance with the conditions of their EAs and Environmental Management Programmes (EMPRs) and the non-compliances with conditions of the EA and EMPr identified during the audit are reported to the DMRE, such non-compliances are not reported to the DMRE within the specified 24 (twenty-four) hours.
3.71	Non-compliance with a condition of this authorization may result in criminal prosecution or other actions provided for in the National Environmental Management Act, 1998 and the regulations.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining.

TABLE 4: ENVIRONMENTAL MANAGEMENT PROGRAMME OOGIESFONTEIN COLLIERY (MP/30/5/1/2/2/338 MR) DATED 10 JANUARY 2010

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1. STRIP MINING			
1.1. Removal of Overburden			
1.1.1	Place excavated materials optimally in terms of surface rehabilitation. Place excavated materials optimally in terms of potential acid generation, if the mining technique allows for stratified handling. All carbonaceous/ acid generating units must be placed in the bottom of the pit, if possible. At Oogiesfontein 100% of the coal floor is flooded at decant and 42% of the pit volume is present below decant elevation (1524mamsl).	C	Excavation and management of stockpiles is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During the site inspection, no concerns were noted on the placement of stockpiles. The " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E. 14/18/2/5219, dated October 2023) outlines the current placement of excavated materials at the mine.
1.1.2	A detailed materials balance must be compiled to optimise placement of spoils, subsoil and topsoil, in order to obtain a well-landscaped and sustainable final rehabilitation profile, to minimise infiltration and intake of atmospheric oxygen.	C	The " <i>Thungela Zibulo Opencast Topsoil Management Plan</i> " dated April 2023 is implemented at Zibulo Colliery: Opencast Mining. The " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E.14/18/2/5219, dated October 2023) is also implemented on the site to optimise the placement of spoils, subsoil and topsoil.
1.1.3	Ongoing monitoring of the rehabilitation process will be undertaken and recommendations on the geological/geohydrological setting will be made.	C	Zibulo Colliery: Opencast Mining undertakes concurrent rehabilitation in accordance with the " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E.14/18/2/5219, dated October 2023). Additionally, an assessment of rehabilitation at Zibulo is undertaken and the outcomes thereof were reported in the " <i>Draft Zibulo Colliery 2024 Rehabilitation Assessment</i> " dated 29 March 2024 drafted by Agreenco Environmental (Pty) Ltd.
1.2. Ongoing rehabilitation during the mining process			
1.2.1	Shape the spoils to emulate the existing topography and create free drainage towards the unnamed tributary of the Saalklapspruit.	C	During the site inspection, ongoing rehabilitation undertaken at Zibulo Colliery Opencast was observed to be conducted in a manner that will facilitate restoration of the tributary.
1.2.2	During steady state mining the usable soil stripped ahead of mining in accordance with the soil stripping map (Figure 2-2) during the dry season will be placed directly on levelled spoils to avoid stockpiling.	C	Rehabilitation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. Zibulo Colliery undertakes concurrent rehabilitation whereby topsoil material is placed on prior disturbed areas, where practical, to avoid stockpiling.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.2.3	Induced compaction will be reduced by limiting the access of vehicles onto the rehabilitated land.	C	Rehabilitation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. Rehabilitation and backfilling of mined areas is encouraged within the existing rehabilitation procedure and is undertaken concurrently. After rehabilitation, access to rehabilitated areas is restricted with the area demarcated by berms. Access to the rehabilitated will only be for maintenance purposes.
1.2.4	The effects of over-compaction will be alleviated by ripping.	C	Rehabilitation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. Zibulo Colliery: Opencast indicated that over-compaction is alleviated by ripping.
1.2.5	A qualified person will carry out soil sampling to establish lime and fertilizer requirements prior to the start of the rehabilitation process.	C	Zibulo Colliery: Opencast reported that a qualified professional has been appointed to undertake soil analysis as part of the Rehabilitation Process. An assessment of rehabilitation at Zibulo was undertaken and the outcomes thereof were reported in the " <i>Draft Zibulo Colliery 2024 Rehabilitation Assessment</i> " dated 29 March 2024 drafted by Agreeco Environmental (Pty) Ltd. Soil fertility was one of the assessment criteria and an action plan was drafted which highlighted the need for fertiliser application to support vegetation growth, together with the addition of calcitic lime to neutralise elevated soil acidity. Soil sampling was conducted by Rehab Green Environmental and Rehabilitation Monitoring Consultants cc and the results thereof were reported in the " <i>Soil chemical status evaluation and fertilizer recommendation</i> " (Report No. RG/2025/01/07/1, dated 27 December 2024).
1.3. Vegetation and fauna			
1.3.1	Vegetation will not be cleared from the site prior to stripping to provide additional organic nutrients to the soil and help preserve the soil structure.	C	Rehabilitation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. To maintain the nutrients and soil structure, vegetation is stripped together with the topsoil during stripping. The stripped material together with the vegetation will then act as seedbanks to be used during rehabilitation.
1.3.2	The mine will demarcate each year the potential area to be mined during that year, the environmental officer will arrange that a rescue operation take place within that area during the growing season of the previous year. Plants rescued will be propagated on site and replaced on the site during rehabilitation.	C	Rehabilitation is undertaken concurrently with mining in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) which provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. Zibulo Colliery reported that no plants were identified for rescue for the audit period (August 2024 - July 2025).
1.3.3	Stands of exotics must be cut and controlled within these areas and used as stipulated in the construction phase.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.3.4	A mixture of the grasses of <i>Eragrostis curvula</i> (8kg/ha), <i>E. tef</i> (3kg/ha), <i>Chloris gayana</i> (2kg/ha), <i>Digitaria eriantha</i> (5kg/ha) and <i>Cynodon dactylon</i> (3kg/ha) recommended for revegetation.	C	Zibulo Colliery undertakes revegetation in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) using the recommended seed mix of <i>Digitaria eriantha</i> , <i>Chloris gayana</i> , <i>Cynodon dactylon</i> and <i>Eragrostis tef</i> .
1.3.5	Once the area has been revegetated, it should be monitored for declared weeds and invasive plants.	C	During site inspection, substantial growth of AIPS were observed around the South Pit area, including the slopes of the safety berms. Zibulo Colliery: Opencast has appointed a registered service provider to eradicate Alien Invader species at Zibulo opencast. The Scope of work and pest control operator registration certificate were provided to the auditors. However, Zibulo Colliery: Opencast has indicated that the area was not yet revegetated, therefore, the mine will monitor for AIPS once the area has been revegetated.
1.3.6	During the initial stages, grazing animals should be kept away from the area.	C	Zibulo Colliery site boundary is fenced off for security reasons as well as to prevent grazing within the mining area. Grazing within the mining area pose a risk to the animals since opencast mining is being undertaken.
1.3.7	Veld fires should be controlled.	C	Zibulo Colliery reported that firebreaks are established around the mine to manage veld fires. Fires are managed in accordance with the " <i>Zibulo Colliery Emergency Preparedness Procedure</i> " (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) .
1.4. Surface water management			
1.4.1	Measures are required to maximise the return of mined areas to the catchment as soon as they will generate clean runoff. All spoils within the opencast section will be rehabilitated and made free draining as soon as possible after placement.	C	Concurrent rehabilitation is undertaken. Spoils are shaped, stabilised and made free draining as soon as possible after placement, allowing the areas to generate clean runoff and be returned to the catchment as soon as possible.
1.4.2	Ensuring the rehabilitated spoils levels line up with the natural topography, including some allowance for settlement.	C	Zibulo Colliery reported that the rehabilitation plan focuses on ensuring that the topography of the rehabilitated mined areas represents that of the pre-developed status as practically possible.
1.4.3	Stripping the full depth of available soft soils to limit the long-term recharge to the mined out area.	C	Stripped soils are being stockpiled and reinstated on rehabilitated areas to promote vegetation growth and to limit long-term recharge into the mined out area.
1.4.4	Grassing will be undertaken on a seasonal basis, to ensure the germination of the grass species. However, by the start of the rainy season all topsoil areas will have been seeded to ensure maximum drainage from these areas of clean water back into the catchment system without excessive suspended solids.	C	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) which provides the requirements for grassing. According to the " <i>Draft 2024 Pre-grass Rehabilitation Surveys</i> " (dated 29 March 2024), regrassing was scheduled for November 2024. Zibulo Colliery: Opencast indicated that Grassing is undertaken as part of the concurrent rehabilitation.
1.4.5	The final rehabilitation plan is based on a free-draining landform, which will require the entire	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	overburden stockpile to be placed back into the pit during decommissioning.		
1.4.6	Manage the dirty water make.	NC 005	Zibulo Opencast Colliery has three (3) licenced pollution control dams namely the 40 MI Dam, the 9 MI Dam and the 1 MI Dam. All dewatered pit water is pumped to the 40 MI Dam and when required, the water is pumped to the 9 MI Dam (balancing dam). These PDCs are used for the collection and storage of dirty water. The water from the dams is used for dust suppression at the Zibulo Opencast Colliery and surplus water is pumped to Phola Coal Processing Plant for re-use in the plan. Additional surplus water is discharged to Emalahleni Water Reclamation Plant (EWRP). However, it was noted during the site inspection that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site and an increase in the dirty water make. The dirty water make in this area is not contained and escapes to the environment.
1.4.7	The water balance should be easily managed for this site, provided there are adequate water tankers to allow the water make to be reused for dust suppression, and adequate pumping capacity back to Phola Coal Processing Plant. Once the water balance model has been calibrated, adequate storage space will be provided to prevent spilling during extreme wet years.	C	Dust suppression at the mine is done making use from the 1 MI PCD making use of water tankers. Adequate surplus water is pumped to Phola Coal Processing Plant with additional surplus water discharged to EWRP. The PCD is equipped with level sensors installed to ensure the mine is at 80% dam safety levels and this is monitored through the SCADA system. As such, there were no dam spills for the current audit period. The water balance model developed as part of the EMPr assessment is being actively maintained and recalibrated using actual site data. Recalibration is undertaken annually and the "Thungela Resources Zibulo Colliery Water Balance Report" (Ref no. 41106601-REP-00002, dated April 2025) noted an improvement in the calibration from June 2024 to December 2024 and highlights further measures to enhance the model.
1.4.8	Note that the provisional pumping rate given here (150l/s) should not be used as a final design parameter, an analysis is required to assess the pumping rate compared to loss of production.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. Zibulo Colliery: Opencast Mining pump rates were verified in the maintenance reports compiled by Endress and Hauser and were confirmed to have a maximum rate of 150 m3/ hr.
1.4.9	The objective of the surface water monitoring system is to ensure that the water management systems perform according to specifications, to act as a pollution early warning system, to check compliance with license requirements and for reporting purposes. The objectives of these systems will be achieved if there is no impact (attributable to the mine) on the in-stream and downstream fitness for use criteria. The sampling points are based on the current sampling points, with only additional points on the mine (for dirty water) added as required. Data will continue to be presented in graphic and tabular form indicating	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The data is presented as per the DWS requirements and submitted to the DWS.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	maximum, minimum and average values with information being submitted annually to DWAF or more frequently if required. As is currently the practice, these submissions are included in the annual EMA.		
1.4.10	Electrical Conductivity, pH, TDS, SS, Cl, SO4, Na, F, Fe, Al, Mn, Zn, Total Alkalinity, Ca, Mg, K, Total Hardness will be measured monthly.	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The surface water analysis includes results for EC, pH, TDS, SS, Cl, SO4, Na, F, Fe, Al, Mn, Zn, Total Alkalinity, Ca, Mg and Total Hardness.
1.4.11	Analyses to 95% charge balance will be undertaken at 6 monthly intervals, including all metals.	C	The results were reported with a 95% charge balance, and the laboratory applied a 95% confidence interval (coverage factor K=2) with an expanded uncertainty of less than 5% as confirmed by the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
1.5. Groundwater management			
1.5.1	Management measures for the operational phase, relating to recharge potential, will focus on continuous rehabilitation as mining progresses. The recharge potential for unlevelled spoils is higher than that for levelled spoils and is higher in turn than that of re-vegetated areas. Continuous, optimal rehabilitation will effectively minimize recharge to areas disturbed by strip mine mining.	C	Rehabilitation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021). Backfilling and rehabilitation is undertaken concurrently with the mining activities to reduce impacts during the operational phase. Further to that, an assessment of rehabilitation at Zibulo was undertaken and the outcomes thereof were reported in the "Draft Zibulo Colliery 2024 Rehabilitation Assessment" dated 29 March 2024 drafted by Agreenco Environmental (Pty) Ltd. The assessment includes an action plan that outlines measures to conduct optimal rehabilitation.
1.5.2	The increased influx of ground water into the strip mine during the operational phase will be managed as part of the total water balance.	C	The groundwater inflows are managed as part of the total water balance for Zibulo Colliery, as recorded in the "Zibulo Colliery Water Balance Report" (Ref no. 41106601-REP-00002, dated April 2025).
1.5.3	Mine planning personnel must determine the extent of strip mine mining for any given time during the operational phase.	C	Thungela showed the Auditors the extent of Zibulo Opencast Colliery's strip mine extend as presented in the updated mine plan and schedule.
1.5.4	These areas, together with the additional areas covered by the virtual cone of depression, must be identified as the areas of potential depression.	C	The IWWMP (2024) reports that the depression cone will form around the pit as mining progresses and the effects after the operational phase, post closure, will be greater once the water table rises and the groundwater encounters the residual carbonaceous material for extended periods.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.5.5	Mine personnel must use the geohydrological information, as provided in Table 2.10(A) and 2.10(B) in Appendix 1 to determine the potential impact of strip mine mining on any given area via the ground water monitoring boreholes.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The groundwater monitoring programme includes BSW03, BSW04, BSW05, BSW06, BSW07, BSW10, BSW11 and BSW12. However, not all the groundwater monitoring points were monitored during the audit period.
1.5.6	The yielding capacity of all boreholes potentially affected, must be mutually agreed on by the owner and mine authorities or through long-term geohydrological pump testing.	C	Zibulo Colliery has been issued with a Water Use Licences (WUL No. 04/B20G/AGJ/809). The mine abstracts the water in accordance with the volumes stipulated in the WUL as approved by the DW&S.
1.5.7	All external users' boreholes within a 1 km radius of any mining activities must be monitored for water level response.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries.
1.5.8	A structured compensation protocol, to be compiled in consultation with external users, will be commissioned for the Oogiesfontein Opencast strip mine areas.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Zibulo Colliery indicated that no external users were identified as the neighbouring areas are unoccupied and the adjacent mine was abandoned.
1.5.9	The main component of such a protocol will be the yielding capacity of external user's resources - a parameter already mutually agreed on. This protocol will control alternative water supply to external users in the event that their ground water resources have been detrimentally affected by Oogiesfontein Opencast strip mine mining activities.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Zibulo Colliery indicated that no external users were identified as the neighbouring areas are unoccupied and the adjacent mine was abandoned.
1.5.10	The protocol will be initiated based upon a geohydrological interpretation of water level response and/or pumping test results.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Zibulo Colliery indicated that no external users were identified as the neighbouring areas are unoccupied and the adjacent mine was abandoned.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.5.11	The ground water monitoring at Oogiesfontein Opencast strip mine must be done subject to monitoring guidelines contained in the document "Minimum Requirements for Monitoring at Waste Management Facilities", published by DWAF.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its open cast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The abovementioned reports comply with the requirements of this obligation.
1.5.12	A formalised and documented ground water monitoring system must be commissioned, according to the requirements outlines in the DWAF publication, and site-specific conditions. The monitoring system must consist of the following components: Dedicated monitoring localities, e.g. boreholes in/around rehabilitated mine workings, boreholes within potential impact zones of surface pollution sources, and selected external users' boreholes and springs. Care must be taken to ensure that the construction specifications of all additional boreholes are fully compliant with the Minimum Requirements of DWAF; Realistic monitoring frequencies; Applicable monitoring/sampling techniques e.g. stratified sampling for monitoring holes, application sampling for external users' boreholes, and grab sampling for springs; Differentiated list of water quality variables, as applicable to the various sampling localities and frequencies; Laboratory analysis techniques will comply with SABS guidelines; Data storage protocols, e.g. data base, GIS.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries. The abovementioned reports comply with the requirements of this obligation.
1.5.13	Six monthly monitoring reports must consist of the following: Systems audit; Efficiency and design; Status of monitoring system; Data audit and the compliance protocols used; Water quality trends and the comparative protocols used; Water quality comparison and verification of analytical quality (ion balances); Hydrochemical image comparison and variation protocol used; Ground water level data trends and comparative protocols used; Upgrading of ground water monitoring system; Conclusions on the monitoring system efficiency; Recommendations on gaps/shortcomings of the current system.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries. The abovementioned reports comply with the requirements of this obligation.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.6. Stockpiling of overburden			
1.6.1	All spoils must be rehabilitated.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining.
1.6.2	The absolute minimum area of vegetation and topsoil will be removed from the mining area at any one time.	C	Zibulo Colliery: Opencast Mining indicated that the minimum area of vegetation is removed from the mining area and the topsoil is managed as per the " <i>Thungela Zibulo Opencast Topsoil Management Plan</i> " dated April 2023.
1.6.3	Spoils will be rehabilitated on an ongoing basis to leaving a maximum of 4 strips of unrehabilitated spoils behind the active pit.	C	Zibulo Colliery: Opencast Mining undertakes concurrent rehabilitation in accordance with the " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E.14/18/2/5219, dated October 2023). Zibulo Colliery: Opencast Mining indicated that a maximum of 4 strips of unrehabilitated spoils behind the active pit.
1.6.4	An indigenous tree screen will be planted around the mine and infrastructure areas.	NC 009	During site inspection, no indigenous tree screen was observed around the mine and infrastructure areas. Zibulo Colliery indicated that there is no space to plant trees on the mine boundary as this is municipal land. However, these constraints do not remove the obligation to comply with the condition.
1.7. Truck and shovel operations			
1.7.1	Applications of a chemical binder to permanent haul roads to develop a crust coupled to watering and sweeping to eliminate dust mobilisation from this source.	NC 007	Zibulo Opencast Colliery undertakes dust suppression in accordance with the " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (ZIB-ENV-PRO-0791) which identifies the sources of dust within the mine and the mitigation measures to be implemented. Dust suppression is conducted at the parking areas, truck waiting areas and the haul roads using water bowsers. Water from the 1 MI PCD is used to suppress dust at the specified areas. Zibulo Colliery: Opencast Mining indicated that a chemical binder was previously used on the permanent haul roads to develop a crust. However, a chemical binder is no longer applied to the permanent haul roads.
1.7.2	The revegetation of idle stockpiles and berms.	NC 003	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During site inspection, it was observed that only the topsoil stockpiles are revegetated. The rest of the stockpiles and berms are not revegetated.
1.7.3	Constant watering (with water trucks) in areas where materials removal, placement or manipulation is occurring.	C	Zibulo Opencast Colliery undertakes dust suppression at the mine using water from the 1 MI PCD. During the site inspection, water spraying by means of water bowsers was observed at the site.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.7.4	On-going dust fallout monitoring using the current network to assess the effectiveness of dust control measures.	C	An on-going dust fallout monitoring programme is in place at Zibulo Colliery: Opencast. The "Gravimetric Dust Fallout Monitoring Report" (Doc Ref. 22-1734-ECO1), compiled by EcoE Innovative Consulting, were availed for the months between August 2024 - April 2025. Three of the four monitoring points, inclusive of the monitoring point located west of opencast were found to be compliant in terms of the non-residential limit of 1 200 mg/m ² /day. However, the monitoring point located south of the opencast at the Police Station recorded four exceedances of the residential limits during the months of August 2024, September 2024, October 2024 and November 2024 which is a non-compliance as per the National Dust Control Regulations. An investigation was conducted that attributed the exceedances to extensive cultivation on close by agricultural land and significant road upgrades nearby.
1.7.5	Under very windy conditions, management on the mine will decide whether haulage should be reduced or stopped altogether until conditions improve.	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (ZIB-ENV-PRO-0791) specifies that the Section Manager: Mining is assigned with the task to manage the mine activities under windy conditions.
1.7.6	Vehicles should not be left idling when not in use.	C	Zibulo Colliery reported that vehicles are not left idling when not in use. During the site inspection, no idling vehicles were observed at the site.
1.7.7	To prevent spontaneous combustion and emissions of greenhouse gases, stockpile containing carbonaceous material will be capped and mined out areas will be rehabilitated as soon possible to prevent old workings being open.	C	Zibulo Colliery undertakes concurrent rehabilitation in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and includes the requirement for capping stockpile containing carbonaceous material.
1.7.8	An air emissions inventory will be developed.	C	Zibulo Colliery's air emission inventory is include in the "Air Quality Management Plan for the Zibulo Colliery" (Ref No. 20AAC13, dated May 2022) compiled by Airshed. Further to that, Zibulo Colliery reported that emissions are reported annually on the National Atmospheric Emission Inventory System (NAEIS).
1.7.9	Strict speed control (30km/h) will be implemented, and the shortest haul routes will be used.	NC 010	Zibulo Colliery: Opencast implements a 40km/hour limit on roads within the site. Signages pertaining to the maximum speed limits are strategically placed around the mine.
2. SOIL HANDLING			
2.1. Ongoing rehabilitation during the mining process			
2.1.1	Shape the spoils to emulate the existing topography and create free drainage towards the unnamed tributary of the Saalklapspruit.	C	During the site inspection, ongoing rehabilitation undertaken at Zibulo Colliery Opencast was observed to be conducted in a manner that will facilitate restoration of the tributary.
2.1.2	Soil will be stripped in accordance with the soil stripping plan which provides the minimum stripping depths.	C	Zibulo Colliery undertakes concurrent rehabilitation in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) which specifies the topsoil stripping depth of 1.5 m. Stripped soils are being stockpiled and reinstated on rehabilitated areas to promote vegetation growth and to limit long-term recharge into the mined out area.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.1.3	The action of soil stripping causes the material to expand in volume, a process known as bulking. This is followed by a degree of natural compaction as the material settles after replacement. Induced compaction will be reduced by limiting the access of vehicles onto the rehabilitated land. The effects of over-compaction will be alleviated by ripping.	C	Rehabilitation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. Zibulo Colliery: Opencast indicated that over-compaction is alleviated by ripping. After rehabilitation, access to rehabilitated areas is restricted with the area demarcated by berms. Access to the rehabilitated area will only be for maintenance purposes.
2.1.4	Induced compaction will be reduced by limiting the access of vehicles onto the rehabilitated land. The effects of over-compaction will be alleviated by ripping.	C	Rehabilitation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. Rehabilitation and backfilling of mined areas is encouraged within the existing rehabilitation procedure and is undertaken concurrently. After rehabilitation, access to rehabilitated areas is restricted with the area demarcated by berms. Access to the rehabilitated area will only be for maintenance purposes.
2.1.5	Vegetation will not be cleared from the site prior to stripping to provide additional organic nutrients to the soil and help preserve the soil structure.	C	Zibulo Colliery undertakes concurrent rehabilitation in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021). To maintain the nutrients and soil structure, vegetation is stripped together with the topsoil during stripping. The stripped material together with the vegetation will then act as seedbanks to be used during rehabilitation.
2.1.6	A mixture of the grasses <i>Eragrostis curvula</i> (8kg/ha), <i>E. tef</i> (3kg/ha), <i>Chloris gayana</i> (2kg/ha), <i>Digitaria eriantha</i> (5kg/ha) and <i>Cynodon dactylon</i> (3kg/ha) is recommended for revegetation.	C	Zibulo Colliery undertakes revegetation in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) using the recommended seed mix of <i>Digitaria eriantha</i> , <i>Chloris gayana</i> , <i>Cynodon dactylon</i> and <i>Eragrostis tef</i> .
2.1.7	Once the area has been revegetated, it should be monitored for declared weeds and invasive plants.	C	During site inspection, substantial growth of AIPS were observed around the South Pit area, including the slopes of the safety berms. Zibulo Colliery: Opencast has appointed a registered service provider to eradicate Alien Invader species at Zibulo opencast. The Scope of work and pest control operator registration certificate were provided to the auditors. However, Zibulo Colliery: Opencast has indicated that the area was not yet revegetated, therefore, the mine will monitor for AIPS once the area has been revegetated.
2.1.8	During the initial stages, grazing animals should be kept away from the area. Veld fires should be controlled.	C	The Zibulo Colliery' site boundary is fenced off for security purposes as well as to prevent grazing within the mining area. Grazing within the mining area pose a risk to the animals since opencast mining is being undertaken. Zibulo Colliery reported that firebreaks are established around the mine to manage veld fires. Fires are managed in accordance with the "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) .
2.2. Surface Water Management			
2.2.1	Stripping the full depth of available soft soils to limit the long-term recharge to the mined-out area.	C	Zibulo Colliery undertakes concurrent rehabilitation in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) which specifies the topsoil stripping depth of 1.5 m. Stripped soils are being stockpiled and reinstated on

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			rehabilitated areas to promote vegetation growth and to limit long-term recharge into the mined out area.
2.2.2	Grassing will be undertaken on a seasonal basis, to ensure germination of the grass species. However, by the start of the rainy season all topsoil areas will have been seeded to ensure maximum drainage from these areas of clean water back into the catchment system without excessive suspended solids.	C	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) which provides the requirements for grassing. According to the "Draft 2024 Pre-grass Rehabilitation Surveys" (dated 29 March 2024), regrassing was scheduled for November 2024. Zibulo Colliery: Opencast indicated that Grassing is undertaken as part of the concurrent rehabilitation.
2.2.3	The final rehabilitation plan is based on a free-draining landform, which will require the entire overburden stockpile to be placed back into the pit during decommissioning.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
2.2.4	Managing the dirty water make.	NC 005	Zibulo Opencast Colliery has three (3) licenced pollution control dams namely the 40 MI Dam, the 9 MI Dam and the 1 MI Dam. All dewatered pit water is pumped to the 40 MI Dam and when required, the water is pumped to the 9 MI Dam (balancing dam). These PDCs are used for the collection and storage of dirty water. The water from the dams is used for dust suppression at the Zibulo Opencast Colliery and surplus water is pumped to Phola Coal Processing Plant for re-use in the plan. Additional surplus water is discharged to Emalahleni Water Reclamation Plant (EWRP). However, it was noted during the site inspection that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site and an increase in the dirty water make. The dirty water make in this area is not contained and escapes to the environment.
2.2.5	The water balance should be easily managed for this site, provided there are adequate water tankers to allow the water make to be reused for dust suppression, and adequate pumping capacity back to Phola Coal Processing Plant. Once the water balance model has been calibrated, adequate storage space will be provided to prevent spilling during extreme wet years.	C	Dust suppression at the mine is done making use from the 1 MI PCD making use of water tankers. Adequate surplus water is pumped to Phola Coal Processing Plant with additional surplus water discharged to EWRP. The PCD is equipped with level sensors installed to ensure the mine is at 80% dam safety levels and this is monitored through the SCADA system. As such, there were no dam spills for the current audit period. The water balance model developed as part of the EMPr assessment is being actively maintained and recalibrated using actual site data. Recalibration is undertaken annually and the " <i>Thungela Resources Zibulo Colliery Water Balance Report</i> " (Ref no. 41106601-REP-00002, dated April 2025) noted an improvement in the calibration from June 2024 to December 2024 and highlights further measures to enhance the model.
2.2.6	Note that the provisional pumping rate given here (150l/s) should not be used as a final design	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. Zibulo Colliery: Opencast Mining pump rates were verified in the maintenance reports compiled by Endress and Hauser and were confirmed to have a maximum rate of 150 m ³ / hr.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	parameter; an analysis is required to assess the pumping rate compared to loss of production.		
2.2.7	The objective of the surface water monitoring system is to ensure that the water management systems perform according to specifications, to act as a pollution early warning system, to check compliance with license requirements and for reporting purposes. The objectives of these systems will be achieved if there is no impact (attributable to the mine) on the in-stream and downstream fitness for use criteria. The sampling points are based on the current sampling points, with only additional points on the mine (for dirty water) added as required. Data will continue to be presented in graphic and tabular form indicating maximum, minimum and average values with information being submitted annually to DWAF or more frequently if required. As is currently the practice, these submissions are included in the annual EMA.	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The data is presented as per the DWS requirements and submitted to the DWS.
2.3. Truck and Shovel Operations			
2.3.1	Applications of a chemical binder to permanent haul roads to develop a crust coupled to watering and sweeping to eliminate dust mobilisation from this source.	NC 007	Zibulo Opencast Colliery undertakes dust suppression in <i>accordance with the "Zibulo Colliery Air Quality Monitoring Procedure"</i> (ZIB-ENV-PRO-0791) which identifies the sources of dust within the mine and the mitigation measures to be implemented. Dust suppression is conducted at the parking areas, truck waiting areas and the haul roads using water bowsers. Water from the 1 MI PCD is used to suppress dust at the specified areas. Zibulo Colliery: Opencast Mining indicated that a chemical binder was previously used on the permanent haul roads to develop a crust. However, a chemical binder is no longer applied to the permanent haul roads.
2.3.2	The revegetation of idle stockpiles and berms.	NC 003	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During site inspection, it was observed that only the topsoil stockpiles are revegetated. The rest of the stockpiles and berms are not revegetated.
2.3.3	Constant watering (with water trucks) in areas where materials removal, placement or manipulation is occurring.	C	Zibulo Opencast Colliery undertakes dust suppression at the mine using water from the 1 MI PCD. During the site inspection, water spraying by means of water bowsers was observed at the site.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.3.4	Ongoing dust fallout monitoring using the current network to assess the effectiveness of dust control measures.	C	An on-going dust fallout monitoring programme is in place at Zibulo Colliery: Opencast. The " <i>Gravimetric Dust Fallout Monitoring Report</i> " (Doc Ref. 22-1734-ECO1), compiled by EcoE Innovative Consulting, were availed for the months between August 2024 - April 2025. Three of the four monitoring points, inclusive of the monitoring point located west of opencast were found to be compliant in terms of the non-residential limit of 1 200 mg/m ² /day. However, the monitoring point located south of the opencast at the Police Station recorded four exceedances of the residential limits during the months of August 2024, September 2024, October 2024 and November 2024 which is a non-compliance as per the National Dust Control Regulations. An investigation was conducted that attributed the exceedances to extensive cultivation on close by agricultural land and significant road upgrades nearby.
2.3.5	Under very windy conditions, management on the mine will decide whether haulage should be reduced or stopped altogether until conditions improve.	C	The " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (ZIB-ENV-PRO-0791) specifies that the Section Manager: Mining is assigned with the task to manage the mine activities under windy conditions.
2.3.6	Vehicles should not be left idling when not in use.	C	Zibulo Colliery reported that vehicles are not left idling when not in use. During the site inspection, no idling vehicles were observed at the site.
2.3.7	To prevent spontaneous combustion and emissions of greenhouse gases, stockpile containing carbonaceous material will be capped and mined out areas will be rehabilitated as soon possible to prevent old workings being open.	C	Zibulo Colliery undertakes concurrent rehabilitation in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and includes the requirement for capping stockpile containing carbonaceous material.
2.3.8	An air emissions inventory will be developed.	C	Zibulo Colliery's air emission inventory is include in the " <i>Air Quality Management Plan for the Zibulo Colliery</i> " (Ref No. 20AAC13, dated May 2022) compiled by Airshed. Further to that, Zibulo Colliery reported that emissions are reported annually on the National Atmospheric Emission Inventory System (NAEIS).
2.3.9	Strict speed control (30km/h) will be implemented and the shortest haul routes will be used.	NC 010	Zibulo Colliery: Opencast implements a 40km/hour limit on roads within the site. Signages pertaining to the maximum speed limits are strategically placed around the mine.
3. DRILLING AND BLASTING			
3.1	Effective blast designs for limiting vibration, air blast and fly rock. This will be carried out by a qualified blasting engineer with experience in opencast and surface blasting operations. Close attention must be given to air blast control methods, especially when blasting the coal, the narrower waste bands and the pre-splits. Stemming design and application will need special attention.	C	Zibulo Colliery: Opencast Mining undertakes blasting in accordance with the " <i>Zibulo Colliery Perform Opencast Blasting Procedure</i> " (Doc no. ZIB-OM-PRO-0578, dated 06 April 2022) which mandates that only the holder of a Permanent Opencast Blasting Certificate or a certificate as recognised by the Mining Qualifications Authority (MQA) may undertake the blasting operation.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.2	Effective blast designs carried out by a qualified and experienced blasting engineer to limit the risk of ground displacement beneath the R545 road during blasting of the initial box-cut development on the west side of the mine.	C	Blast designs carried out by a qualified and experienced blasting engineer were provided to the auditor in the R545 Plan titled " <i>Permission to mine within 100m of sewage pipeline</i> " (Ref.: G.M.E. 14/18/2/5219, dated 03 June 2025). Additionally, the letter titled " <i>Comments on restrictions and conditions regarding the mining operations under or within a horizontal distance of 100 metres from surface structures and objects to be protected: Regulation 17(6)(a), 17(7)(a) and 17(9)(a) of the mine health and safety act, (Act 29 of 1996)</i> " (Ref: MP11/18/2-N2530281/25, dated 08 September 2025) from the DMPR which addresses the comments on restrictions and conditions sought for permission to mine within a horizontal distance 100m from the Provincial Road R545 and accompanying plans from the mine manager and mine surveyor were provided to the auditors.
3.3	Smaller charge masses will need to be applied in the southern part of the mine to prevent blasting induced vibrations that are too high in the Ogies village. Mining closer than 500 m to the southern perimeter of the mine should, therefore, be carried out using 165 mm holes.	C	A blasting plan showing the blast area in relation to the southern perimeter was provided. Zibulo Colliery indicated that the hole diameter and associated blasting parameters applied in this zone are in accordance with the requirements of the condition.
3.4	Auditing of all surface blasts closer than 500 m from any mine boundary to make sure there are no overcharged holes or incorrectly applied designs. This can be carried out by a mine employee but is more effective if done by a third party who carries some liability for errors in application.	C	The " <i>Zibulo Colliery Noise and Vibration Monitoring Procedure</i> " (Doc no. ZIB-INV-PRO-0823, dated 10 November 2017) specifies that a Service Provider is used for ground vibration and air blasts level monitoring at the Mine. There are four (4) Instantel Seismographs that are permanently fitted on the property and surrounding areas and data is retrieved monthly in the form of a report. The <i>Ground Vibration and Air Blast Monitoring</i> reports for January 2025 to March 2025 were availed to the auditors.
3.5	Monitoring of air blast and vibration for every surface blast using blasting seismographs located at sensitive positions.	C	Blasting is undertaken in accordance with the " <i>Zibulo Colliery Noise and Vibration Monitoring Procedure</i> " (Doc no. ZIB-INV-PRO-0823, dated 10 November 2017). The procedure includes the key receptors at the Oil Office – eastern boundary of the opencast, N12 highway, Ogies Mill – Southern boundary of the opencast. Seismographs are permanently fitted on the property and surrounding areas. The Instantel Seismographs are placed in such a way that monitoring covers all the identified receptors. The <i>Ground Vibration and Air Blast Monitoring for February 2025</i> (Ref no. BMC_Zibulo_February2025_MGVA, dated 04 March 2025) and <i>Ground Vibration and Air Blast Monitoring for March 2025</i> (Ref no. BMC_Zibulo_March2025_MGVA, dated 03 April 2025) were availed to the auditors.
3.6	Good quality initiation systems will be necessary for all the blasting. Detonating cord should not be used because of the high air blast that it will generate. For all blasting closer than 500 m to the final perimeter of the mine, precise detonators (accuracy of 1 ms or less) should be used for effective control of vibration, air blast and fly rock.	C	The " <i>Zibulo Colliery Blast Radius Plan Material</i> " (dated March 2025) blast radius map was provided showing a blast monitoring point, 350 m and 500 m predicted radii, the mine boundary and surrounding buildings. The " <i>Delivery Note Customer copy / dangerous goods declaration</i> " (Ref: 4503029012, dated 05 November 2025) issued by AECI Mining Explosives confirm the usage of Intellishot detonators without detonating cord which meets the requirements of this condition.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.7	When blasting closer than 500 m to the R545 or the N12 highway, road closure will be necessary during blasting times to prevent the risk of fly rock injuries to motorists. Road closures will be done in conjunction with the Traffic Authorities.	C	Zibulo Colliery: Opencast reported that there is constant and continual engagement between the mine and the local law enforcement engagements. The " <i>Zibulo Colliery Perform Opencast Blasting Procedure</i> " (Doc no. ZIB-OM-PRO-0578, dated 06 April 2022) was availed to the auditors and is implemented at the mine. The procedure calls for closure of public areas during blasting for safety purposes.
3.8	Explosive quality control measures will need to be implemented to prevent the generation of nitrous fumes and carbon monoxide during blasting. The quality control is normally carried out by the explosives supplier, but test results will need to be checked by mine management on a regular basis.	C	Zibulo Colliery: Opencast indicated that explosive quality control is conducted by the explosives supplier and the mine's qualified blasting technician verifies the explosives batch upon delivery against supplier documentation.
4. COAL REMOVAL AND TRANSPORT			
4.1. Surface Water Management			
4.1.1	Measures are required to maximise the return of mined areas to the catchment as soon as they will generate clean runoff. All spoils within the opencast section will be rehabilitated and made free draining as soon as possible after placement	C	Concurrent rehabilitation is undertaken. Spoils are shaped, stabilised and made free draining as soon as possible after placement, allowing the areas to generate clean runoff and be returned to the catchment as soon as possible.
4.1.2	Ensuring the rehabilitated spoils levels line up with the natural topography, including some allowance for settlement.	C	Zibulo Colliery reported that the rehabilitation plan focuses on ensuring that the topography of the rehabilitated mined areas represents that of the pre-developed status as practically possible.
4.1.3	Stripping the full depth of available soft soils to limit the long-term recharge to the mined-out area.	C	Stripped soils are being stockpiled and reinstated on rehabilitated areas to promote vegetation growth and to limit long-term recharge into the mined out area.
4.1.4	Grassing will be undertaken on a seasonal basis, to ensure germination of the grass species. However, by the start of the rainy season all topsoil areas will have been seeded to ensure maximum drainage from these areas of clean water back into the catchment system without excessive suspended solids.	C	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) which provides the requirements for grassing. According to the "Draft 2024 Pre-grass Rehabilitation Surveys" (dated 29 March 2024), regassing was scheduled for November 2024. Zibulo Colliery: Opencast indicated that Grassing is undertaken as part of the concurrent rehabilitation.
4.1.5	The final rehabilitation plan is based on a free-draining landform, which will require the entire overburden stockpile to be placed back into the pit during decommissioning.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.1.6	Managing the dirty water make.	NC 005	Zibulo Opencast Colliery has three (3) licenced pollution control dams namely the 40 MI Dam, the 9 MI Dam and the 1 MI Dam. All dewatered pit water is pumped to the 40 MI Dam and when required, the water is pumped to the 9 MI Dam (balancing dam). These PDCs are used for the collection and storage of dirty water. The water from the dams is used for dust suppression at the Zibulo Opencast Colliery and surplus water is pumped to Phola Coal Processing Plant for re-use in the plan. Additional surplus water is discharged to Emalaheni Water Reclamation Plant (EWRP). However, it was noted during the site inspection that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site and an increase in the dirty water make. The dirty water make in this area is not contained and escapes to the environment.
4.1.7	The water balance should be easily managed for this site, provided there are adequate water tankers to allow the water make to be reused for dust suppression, and adequate pumping capacity back to Phola Coal Processing Plant. Once the water balance model has been calibrated, adequate storage space will be provided to prevent spilling during extreme wet years.	C	Dust suppression at the mine is done making use from the 1 MI PCD making use of water tankers. Adequate surplus water is pumped to Phola Coal Processing Plant with additional surplus water discharged to EWRP. The PCD is equipped with level sensors installed to ensure the mine is at 80% dam safety levels and this is monitored through the SCADA system. As such, there were no dam spills for the current audit period. The water balance model developed as part of the EMPr assessment is being actively maintained and recalibrated using actual site data. Recalibration is undertaken annually and the " <i>Thungela Resources Zibulo Colliery Water Balance Report</i> " (Ref no. 41106601-REP-00002, dated April 2025) noted an improvement in the calibration from June 2024 to December 2024 and highlights further measures to enhance the model.
4.1.8	Note that the provisional pumping rate given here (150l/s) should not be used as a final design parameter; an analysis is required to assess the pumping rate compared to loss of production.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. Zibulo Colliery: Opencast Mining pump rates were verified in the maintenance reports compiled by Endress and Hauser and were confirmed to have a maximum rate of 150 m3/ hr.
4.1.9	The objective of the surface water monitoring system is to ensure that the water management systems perform according to specifications, to act as a pollution early warning system, to check compliance with license requirements and for reporting purposes. The objectives of these systems will be achieved if there is no impact (attributable to the mine) on the in-stream and downstream fitness for use criteria. The sampling points are based on the current sampling points, with only additional points on the mine (for dirty water) added as required. Data will continue to be presented in graphic and tabular form indicating maximum, minimum and average values with information being submitted annually to DWAF or more frequently if required. As is currently the	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The data is presented as per the DWS requirements and submitted to the DWS.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	practice, these submissions are included in the annual EMA.		
4.2. Truck and shovel operations			
4.2.1	Applications of a chemical binder to permanent haul roads to develop a crust coupled to watering and sweeping to eliminate dust mobilisation from this source	NC 007	Zibulo Opencast Colliery undertakes dust suppression in accordance with the "Zibulo Colliery Air Quality Monitoring Procedure" (ZIB-ENV-PRO-0791) which identifies the sources of dust within the mine and the mitigation measures to be implemented. Dust suppression is conducted at the parking areas, truck waiting areas and the haul roads using water bowsers. Water from the 1 MI PCD is used to suppress dust at the specified areas. Zibulo Colliery: Opencast Mining indicated that a chemical binder was previously used on the permanent haul roads to develop a crust. However, a chemical binder is no longer applied to the permanent haul roads.
4.2.2	The revegetation of idle stockpiles and berms.	NC 003	Revegetation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021). During site inspection, it was observed that only the topsoil stockpiles are revegetated. The rest of the stockpiles and berms are not revegetated.
4.2.3	Constant watering (with water trucks) in areas where materials removal, placement or manipulation is occurring.	C	Zibulo Opencast Colliery undertakes dust suppression at the mine using water from the 1 MI PCD. During the site inspection, water spraying by means of water bowsers was observed at the site.
4.2.4	Ongoing dust fallout monitoring using the current network to assess the effectiveness of dust control measures.	C	An on-going dust fallout monitoring programme is in place at Zibulo Colliery: Opencast. The "Gravimetric Dust Fallout Monitoring Report" (Doc Ref. 22-1734-ECOI), compiled by EcoE Innovative Consulting, were availed for the months between August 2024 - April 2025. Three of the four monitoring points, inclusive of the monitoring point located west of opencast were found to be compliant in terms of the non-residential limit of 1 200 mg/m ² /day. However, the monitoring point located south of the opencast at the Police Station recorded four exceedances of the residential limits during the months of August 2024, September 2024, October 2024 and November 2024 which is a non-compliance as per the National Dust Control Regulations. An investigation was conducted that attributed the exceedances to extensive cultivation on close by agricultural land and significant road upgrades nearby.
4.2.5	Under very windy conditions, management on the mine will decide whether haulage should be reduced or stopped altogether until conditions improve.	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (ZIB-ENV-PRO-0791) specifies that the Section Manager: Mining is assigned with the task to manage the mine activities under windy conditions.
4.2.6	Vehicles should not be left idling when not in use.	C	Zibulo Colliery reported that vehicles are not left idling when not in use. During the site inspection, no idling vehicles were observed at the site.
4.2.7	To prevent spontaneous combustion and emissions of greenhouse gases, stockpile containing carbonaceous material will be capped and mined out areas will be rehabilitated as soon able to prevent old workings being open.	C	Zibulo Colliery undertakes concurrent rehabilitation in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and includes the requirement for capping stockpile containing carbonaceous material.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.2.8	An air emissions inventory will be developed.	C	Zibulo Colliery's air emission inventory is include in the " <i>Air Quality Management Plan for the Zibulo Colliery</i> " (Ref No. 20AAC13, dated May 2022) compiled by Airshed. Further to that, Zibulo Colliery reported that emissions are reported annually on the National Atmospheric Emission Inventory System (NAEIS).
4.2.9	Strict speed control (30km/h) will be implemented and the shortest haul routes will be used.	NC 010	Zibulo Colliery: Opencast implements a 40km/hour limit on roads within the site. Signages pertaining to the maximum speed limits are strategically placed around the mine.
5. WATER HANDLING			
5.1. Removal of overburden			
5.1.1	Place excavated materials optimally in terms of surface rehabilitation. Place excavated materials optimally in terms of potential acid generation, if the mining technique allows for stratified handling.	C	Excavation and management of stockpiles is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During the site inspection, no concerns were noted on the placement of stockpiles. The " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E. 14/18/2/5219, dated October 2023) outlines the current placement of excavated materials at the mine.
5.1.2	A detailed materials balance must be compiled to optimise placement of spoils, subsoil and topsoil, in order to obtain a well-landscaped and sustainable final rehabilitation profile, to minimise infiltration and intake of atmospheric oxygen.	C	The " <i>Thungela Zibulo Opencast Topsoil Management Plan</i> " dated April 2023 is implemented at Zibulo Colliery: Opencast Mining. The " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E.14/18/2/5219, dated October 2023) is also implemented on the site to optimise the placement of spoils, subsoil and topsoil. The " <i>Zibulo - Rehabilitation Review High Level Topsoil Review & Recommendation</i> " dated 16 March 2020 includes a material balance.
5.1.3	Ongoing monitoring of the rehabilitation process will be undertaken and recommendations on the geological/geohydrological setting will be made.	C	Zibulo Colliery: Opencast Mining undertakes concurrent rehabilitation in accordance with the " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E.14/18/2/5219, dated October 2023). Additionally, an assessment of rehabilitation at Zibulo is undertaken and the outcomes thereof were reported in the " <i>Draft Zibulo Colliery 2024 Rehabilitation Assessment</i> " dated 29 March 2024 drafted by Agreeco Environmental (Pty) Ltd.
5.2. Ongoing rehabilitation during the mining process			
5.2.1	Vegetation will not be cleared from the site prior to stripping to provide additional organic nutrients to the soil and help preserve the soil structure.	C	Rehabilitation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and provides the requirements for stripping, excavation, stockpiling, re-vegetation and profiling. To maintain the nutrients and soil structure, vegetation is stripped together with the topsoil during stripping. The stripped material together with the vegetation will then act as seedbanks to be used during rehabilitation.
5.2.2	A mixture of the grasses <i>Eragrostis curvula</i> (8kg/ha), <i>E. tef</i> (3kg/ha), <i>Chloris gayana</i> (2kg/ha), <i>Digitaria eriantha</i> (5kg/ha) and <i>Cynodon dactylon</i> (3kg/ha) is recommended for revegetation.	C	Zibulo Colliery undertakes revegetation in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) using the recommended seed mix of <i>Digitaria eriantha</i> , <i>Chloris gayana</i> , <i>Cynodon dactylon</i> and <i>Eragrostis tef</i> .

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.2.3	Once the area has been revegetated, it should be monitored for declared weeds and invasive plants.	C	During site inspection, substantial growth of AIPS were observed around the South Pit area, including the slopes of the safety berms. Zibulo Colliery: Opencast has appointed a registered service provider to eradicate Alien Invader species at Zibulo opencast. The Scope of work and pest control operator registration certificate were provided to the auditors. However, Zibulo Colliery: Opencast has indicated that the area was not yet revegetated, therefore, the mine will monitor for AIPS once the area has been revegetated.
5.2.4	During the initial stages, grazing animals should be kept away from the area. Veld fires should be controlled.	C	The Zibulo Colliery' site boundary is fenced off for security purposes as well as to prevent grazing within the mining area. Grazing within the mining area poses a risk to the animals since opencast mining is being undertaken. Zibulo Colliery reported that firebreaks are established around the mine to manage veld fires. Fires are managed in accordance with the " <i>Zibulo Colliery Emergency Preparedness Procedure</i> " (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) .
5.3. Surface water management			
5.3.1	Measures are required to maximise the return of mined areas to the catchment as soon as they will generate clean runoff. All spoils within the opencast section will be rehabilitated and made free draining as soon as possible after placement.	C	Concurrent rehabilitation is undertaken. Spoils are shaped, stabilised and made free draining as soon as possible after placement, allowing the areas to generate clean runoff and be returned to the catchment as soon as possible.
5.3.2	Ensuring the rehabilitated spoils levels line up with the natural topography, including some allowance for settlement.	C	Zibulo Colliery reported that the rehabilitation plan focuses on ensuring that the topography of the rehabilitated mined areas represents that of the pre-developed status as practically possible.
5.3.3	Stripping the full depth of available soft soils to limit the long-term recharge to the mined-out area.	C	Stripped soils are being stockpiled and reinstated on rehabilitated areas to promote vegetation growth and to limit long-term recharge into the mined out area.
5.3.4	Grassing will be undertaken on a seasonal basis, to ensure germination of the grass species. However, by the start of the rainy season all topsoil areas will have been seeded to ensure maximum drainage from these areas of clean water back into the catchment system without excessive suspended solids.	C	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) which provides the requirements for grassing. According to the "Draft 2024 Pre-grass Rehabilitation Surveys" (dated 29 March 2024), regrassing was scheduled for November 2024. Zibulo Colliery: Opencast indicated that Grassing is undertaken as part of the concurrent rehabilitation.
5.3.5	The final rehabilitation plan is based on a free-draining landform, which will require the entire overburden stockpile to be placed back into the pit during decommissioning.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.3.6	Managing the dirty water make.	NC 005	Zibulo Opencast Colliery has three (3) licenced pollution control dams namely the 40 MI Dam, the 9 MI Dam and the 1 MI Dam. All dewatered pit water is pumped to the 40 MI Dam and when required, the water is pumped to the 9 MI Dam (balancing dam). These PDCs are used for the collection and storage of dirty water. The water from the dams is used for dust suppression at the Zibulo Opencast Colliery and surplus water is pumped to Phola Coal Processing Plant for re-use in the plan. Additional surplus water is discharged to Emalaheni Water Reclamation Plant (EWRP). However, it was noted during the site inspection that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site and an increase in the dirty water make. The dirty water make in this area is not contained and escapes to the environment.
5.3.7	The water balance should be easily managed for this site, provided there are adequate water tankers to allow the water make to be reused for dust suppression, and adequate pumping capacity back to Phola Coal Processing Plant. Once the water balance model has been calibrated, adequate storage space will be provided to prevent spilling during extreme wet years.	C	Dust suppression at the mine is done making use from the 1 MI PCD making use of water tankers. Adequate surplus water is pumped to Phola Coal Processing Plant with additional surplus water discharged to EWRP. The PCD is equipped with level sensors installed to ensure the mine is at 80% dam safety levels and this is monitored through the SCADA system. As such, there were no dam spills for the current audit period. The water balance model developed as part of the EMPr assessment is being actively maintained and recalibrated using actual site data. Recalibration is undertaken annually and the " <i>Thungela Resources Zibulo Colliery Water Balance Report</i> " (Ref no. 41106601-REP-00002, dated April 2025) noted an improvement in the calibration from June 2024 to December 2024 and highlights further measures to enhance the model.
5.3.8	Note that the provisional pumping rate given here (150l/s) should not be used as a final design parameter; an analysis is required to assess the pumping rate compared to loss of production.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast Mining. Zibulo Colliery: Opencast Mining pump rates were verified in the maintenance reports compiled by Endress and Hauser and were confirmed to have a maximum rate of 150 m3/ hr.
5.3.9	The objective of the surface water monitoring system is to ensure that the water management systems perform according to specifications, to act as a pollution early warning system, to check compliance with license requirements and for reporting purposes. The objectives of these systems will be achieved if there is no impact (attributable to the mine) on the in-stream and downstream fitness for use criteria. The sampling points are based on the current sampling points, with only additional points on the mine (for dirty water) added as required. Data will continue to be presented in graphic and tabular form indicating maximum, minimum and average values with information being submitted annually to DWAF or more frequently if required. As is currently the	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The data is presented as per the DWS requirements and submitted to the DWS.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	practice, these submissions are included in the annual EMA.		
5.4. Groundwater management			
5.4.1	Management measures for the operational phase, relating to recharge potential, will focus on continuous rehabilitation as mining progresses. The recharge potential for unlevelled spoils is higher than that for levelled spoils, and is higher in turn than that of re-vegetated areas. Continuous, optimal rehabilitation will effectively minimize recharge to areas disturbed by strip mine mining.	C	Rehabilitation is undertaken in accordance with the "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021). Backfilling and rehabilitation is undertaken concurrently with the mining activities to reduce impacts during the operational phase. Further to that, an assessment of rehabilitation at Zibulo was undertaken and the outcomes thereof were reported in the " <i>Draft Zibulo Colliery 2024 Rehabilitation Assessment</i> " dated 29 March 2024 drafted by Agreenco Environmental (Pty) Ltd. The assessment includes an action plan that outlines measures to conduct optimal rehabilitation.
5.4.2	The increased influx of ground water into the strip mine during the operational phase will be managed as part of the total water balance.	C	The groundwater inflows are managed as part of the total water balance for Zibulo Colliery, as recorded in the " <i>Zibulo Colliery Water Balance Report</i> " (Ref no. 41106601-REP-00002, dated April 2025).
5.4.3	Mine planning personnel must determine the extent of strip mine mining for any given time during the operational phase.	C	Thungela showed the Auditors the extent of Zibulo Opencast Colliery's strip mine extend as presented in the updated mine plan and schedule.
5.4.4	These areas, together with the additional areas covered by the virtual cone of depression, must be identified as the areas of potential depletion.	C	The IWWMP (2024) reports that the depression cone will form around the pit as mining progresses and the effects after the operational phase, post closure, will be greater once the water table rises and the groundwater encounters the residual carbonaceous material for extended periods.
5.4.5	Mine personnel must use the geohydrological information, as provided in Table 2.10(A) and 2.10(B) in Appendix 1 to determine the potential impact of strip mine mining on any given area via the ground water monitoring boreholes.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The groundwater monitoring programme includes BSW03, BSW04, BSW05, BSW06, BSW07, BSW10, BSW11 and BSW12. However, not all the groundwater monitoring points were monitored during the audit period.
5.4.6	The yielding capacity of all boreholes potentially affected, must be mutually agreed on by the owner and mine authorities or through long-term geohydrological pump testing.	C	Zibulo Colliery has been issued with a Water Use Licences . The mine abstracts the water in accordance with the volumes stipulated in the WUL as approved by the DW&S.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.4.7	All external users' boreholes within a 1 km radius of any mining activities must be monitored for water level response.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WULs issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries.
5.4.8	A structured compensation protocol, to be compiled in consultation with external users, will be commissioned for the Oogiesfontein Opencast strip mine areas. The main component of such a protocol will be the yielding capacity of external users resources – a parameter already mutually agreed on. This protocol will control alternative water supply to external users in the event that their ground water resources have been detrimentally affected by Oogiesfontein Opencast strip mine mining activities. The protocol will be initiated based upon a geohydrological interpretation of water level response and/or pumping test results.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Zibulo Colliery indicated that no external users were identified as the neighbouring areas are unoccupied and the adjacent mine was abandoned.
5.4.9	The ground water monitoring at Oogiesfontein Opencast strip mine must be done subject to monitoring guidelines contained in the document "Minimum Requirements for Monitoring at Waste Management Facilities", published by DWAF.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WULs issued by the DW&S for its open cast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
5.4.10	A formalised and documented ground water monitoring system must be commissioned, according to the requirements outlines in the DWAF publication, and site-specific conditions.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WULs issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.4.11	The monitoring system must consist of the following components: Dedicated monitoring localities, e.g. boreholes in/around rehabilitated mine workings, boreholes within potential impact zones of surface pollution sources, and selected external users' boreholes and springs. Care must be taken to ensure that the construction specifications of all additional boreholes are fully compliant with the Minimum Requirements of DWAF; Realistic monitoring frequencies; Applicable monitoring/sampling techniques e.g. stratified sampling for monitoring holes, application sampling for external users' boreholes, and grab sampling for springs; Differentiated list of water quality variables, as applicable to the various sampling localities and frequencies; Laboratory analysis techniques will comply with SABS guidelines; Data storage protocols, e.g. data base, GIS.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries. The abovementioned reports comply with the requirements of this obligation.
5.4.12	Six monthly monitoring reports must consist of the following: Systems audit; Efficiency and design; Status of monitoring system; Data audit and the compliance protocols used; Water quality trends and the comparative protocols used; Water quality comparison and verification of analytical quality (ion balances); Hydrochemical image comparison and variation protocol used; Ground water level data trends and comparative protocols used; Upgrading of ground water monitoring system; Conclusions on the monitoring system efficiency; Recommendations on gaps/shortcomings of the current system.	C	Zibulo Colliery undertakes quarterly ground water monitoring in accordance with WUL issued by the DW&S for its opencast operation. The ground water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the Certificates of analysis for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd. The quarterly ground water monitoring includes the water levels of the monitoring points of both internal and external boreholes within a 1km radius from the mine boundaries. The abovementioned reports comply with the requirements of this obligation.
6. OPERATIONAL PERSONNEL			
6.1. LABOUR			
	No housing of staff on-site.	C	No housing of staff is currently undertaken at Zibulo Colliery: Opencast Mining.
6.1.1	Facilitating local business participation in provision of mine service.	C	The "Thungela Social and Labour Plan, Zibulo Colliery (Ogiesfontein) (MP) 30/5/1/2/2/338 MR (2021 - 2025)" was availed to the auditors. The Zibulo Colliery Social Labour Plan (SLP) provides Thungela's strategies for promoting inclusive procurement and increase spending with BBBEE-compliant, Black Owned, Black Women Owned and Black Youth Owned, companies, especially Small, Medium, and Micro Enterprises (SMMEs).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
6.1.2	Sourcing labour, goods and services in the surrounding area, where feasible with a transparent, well planned recruitment process with maintenance of open communication.	C	The " <i>Thungela Social and Labour Plan, Zibulo Colliery (Ogiesfontein) (MP) 30/5/1/2/2/338 MR (2021 - 2025)</i> " was availed to the auditors. The SLP outlines how the recruitment of local communities are undertaken. Zibulo Colliery: Opencast Mining indicated that the recruitment process and policy is widely communicated through the Job Opportunities page on the Thungela website. To capacitate communities, Zibulo operates an Adult Education and Training (AET) centre in Phola. Zibulo Colliery employs 30 % of its workforce from Phola, Ogies Kriel and Leandra, which are the surrounding communities. Furthermore, Zibulo Colliery has developed a database of local service providers, and this is used for procurement purposes. The plan further indicated that there is constant engagement with the local businesses in terms of procurement.
6.1.3	Working with local agencies to combat HIV/aids.	C	The " <i>Thungela Inyosi Coal Social and Labour Plan (2021 - 2025) Zibulo Colliery (MP) 30/5/1/2/2/338 MR (Ogiesfontein)</i> " was availed to the auditors and makes provision for employees and contractors to be made aware of the issues surrounding the spread of HIV and AIDS in the area. Additionally, Zibulo Colliery: Opencast Mining undertakes continuous HIV awareness and training using targeted posters and training material, which were provided to the auditors during the audit.
6.2. Mine traffic			
6.2.1	Appropriate measures such as slip lanes and slow down lanes will be implemented on the R555 and at the junction between the R555 and the R545.	C	During site inspection, the Auditors observed that slip lanes have been established to allow the free movement of traffic on the Provincial Road R545.
6.2.2	Speed limits will be set and the lighting in the area will be improved.	C	Speed limit signs were observed within the mining boundaries and on the R555 and at the junction between the R555 and the R545. No evidence of lighting issues were observed at the time of the audit.
6.2.3	All traffic management measures will be done in conjunction with the Traffic Authorities.	C	Thungela mentioned that there is constant and continual engagement between the mine and the local law enforcement engagements.

TABLE 5: ENVIRONMENTAL AUTHORISATION FOR THE EXTENSION OF MINING ACTIVITIES ON PORTIONS 1G, 21, 41 AND 55 OF THE FARM OOGIESFONTEIN 4 IS AND THE REMAINING EXTENT OF PORTION 12 OF THE FARM KLIPFONTEIN 3 IS ISSUED ON 12 FEBRUARY 2020 WITH REFERENCE NUMBER 30/5/1/2/3/2/1/338 EA

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8. CONDITIONS			
8.1. STANDARD CONDITIONS			
8.1.1	Authorisation of the activity is subject to the conditions contained in this Authorisation, which forms part of the Environmental Authorisation and are binding on the holder of the Authorisation,	T/N	Zibulo Colliery appointed an Environmental Superintendent to bear overall responsibility for giving effect to the conditions of the Environmental Authorisation (EA) (DARDLEA REF. MP 130/5/1/2/3/2/1/338 EA) and ensure compliance. Additionally, Zibulo Colliery appoints an independent external auditor to conduct annual audits to verify compliance with the conditions of their EAs and Environmental Management Programmes (EMPRs). The auditors were provided with the most recent audit report, " <i>Thungela Zibulo Colliery: Opencast, Annual External Environmental Performance Assessment Report (2023 - 2024)</i> " (January 2024) compiled by NTC Group (Pty) Ltd. Non-compliances with conditions of the EA identified during the audit are managed according to Zibulo Colliery's " <i>Incident and Non-Conformance Reporting Procedure</i> " (Doc No. ZIB-ENV-PRO-0814 , dated 10 November 2017), by logging the incident onto the Environmental Management System Electronic Database (ENABLON) and assigning corrective and preventative actions, target dates and responsible persons for addressing the incident.
8.1.2	The holder of the Authorisation shall be responsible for ensuring compliance with the conditions by any person acting on his or her behalf, including but not limited to, an agent, sub-contractor, employee or person rendering a service to the holder of the Authorisation.	T/N	The " <i>Zibulo Competency Training and Authority Procedure</i> " (Doc No. ZIB-ENV-PRO-0805, dated 10 October 2017) mandates employees, permanent, long term and medium term contract staff, and those returning from annual leave to attend annual site induction prior to commencing work on site. The " <i>Zibulo Environmental Induction</i> " (Doc No. V5) was availed to the auditors and provides requirements regarding environmental good practice and topics related to the EA and EMPr conditions. Additionally, the Thungela Zibulo Colliery Induction Schedule 2025 - Register dated 19 May 2025 was verified by the auditors.
8.1.3	The activity which is authorised may only be carried out at the property indicated above (Point B: 3).	C	Zibulo Colliery's opencast mining is currently in operational phase, and all related activities are undertaken on the properties authorised in the EA (DARDLEA REF. MP 130/5/1/2/3/2/1/338 EA), as verified by the auditors during the site inspection. No activities were observed outside of the properties approved in the EA: Portions 19,21,41 and 55 of the Farm Oogiesfontein and the Remaining Extent of the portion 12 of the Farm Klipfontein 3 IS.
	This Environmental Authorization remains valid for the entire duration of the mining operation, however it must be noted that the holder cannot implement any activities stipulated on the Environmental Authorization without a valid mining right.	C	Zibulo Colliery: Opencast mining is currently in operational phase, and all related facilities and activities are undertaken as authorised in the Mining Right and EA (DARDLEA REF. 17/2/2/2 NK-7), as verified by the auditors during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.1.5	Any changes to, or deviations from, the project description set out in this Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the Authorisation to apply for further Authorisation in terms of the Regulations.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast. No changes to, or deviations from the project description occurred during the audit period (August 2024 - July 2025).
8.1.6	Where any of the applicant's contact details change, including the name of the responsible person, the physical or postal address and/or telephonic details, including the transfer of this authorization, the applicant must in writing notify the Regional Manager of this Department, within fourteen (14) days of the above specified change.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast. No changes to contact details, responsible person, physical/ postal address, telephonic details, or transfer of this EA occurred for the audit period.
8.1.7	A copy of this authorisation must be kept on site. The Authorisation must be produced to any Governmental official(s) who may requests to see it for inspection purposes and must be made available to the contractor(s) /subcontractor(s) authorised to undertake to undertake work at the property.	C	A hard copy of the EA was available during the audit and an electronic copy is available on Zibulo Colliery's Shared Drive.
8.1.8	This authorisation does not negate the holder of the Authorisation's responsible to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	T/N	The requisite EAs in terms of the NEMA (Act 107 of 1998) for activities undertaken by Zibulo Colliery's opencast mining operation have been obtained, and no unauthorised activities were observed during the site inspection. Zibulo Colliery's opencast mining operation water use activities have been authorised by the DW&S in terms of Section 21 of the NWA (Act 36 of 1998) and Water Use Licences have been issued.
8.1.9	After an appeal period has expired and no good course to extent the appeal period has been submitted in accordance with Chapter 2 of the National Appeal Regulations of 2014, a thirty (30) day-written notice must be given to the Department that the activity will commence. The notice must include a date on which it is anticipated that the activity will commence.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2 SPECIFIC CONDITIONS			
8.2.1 COMMISSIONING OF THE ACTIVITY			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.2.1.1	This Authorization is hereby solely granted for the mining of the eastern and northern area of the existing mining right area, including ramps, haul roads, coal product stockpile, soft and hard overburden dumps, topsoil stockpile, and other associated activities. The activity may not commence without the necessary permits/licenses/approvals and/or service agreements, where it is relevant, from or with the relevant regulatory authorities whether national, provincial or local.	C	The requisite EAs in terms of the NEMA (Act 107 of 1998) for activities undertaken by Zibulo Colliery's opencast mining operation have been obtained, and no unauthorised activities were observed during the site inspection. Zibulo Colliery's opencast mining operation water use activities have been authorised by the DW&S in terms of Section 21 of the NWA (Act 36 of 1998) and Water Use Licences have been issued.
8.2.1.2	The applicant must apply the principle of best practicable environmental option for all technologies used/implemented during mining.	C	Zibulo Colliery implements and maintains a certified Environmental Management System (ISO 14001: 2015), verifying its commitment towards best environmental practice. The SHE Policy outlines Zibulo Colliery's overarching environmental goals, which includes the continual improvement of environmental performance and the policy is signed by the General Manager, demonstrating the support and commitment by top management. The SHE Policy is communicated to employees, contractors and visitors during site induction (<i>Zibulo Environmental Induction - V5</i>) and was observed on notice boards around the site during the site inspection.
8.2.1.3 Pre-construction Phase			
a)	The applicant must appoint an independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EMP and EA	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
b)	The applicant must provide all contractors and sub-contractors with a copy of Environmental Management Programme and Environmental Authorization prior to the mining activities.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
c)	All pre-construction phase mitigation measures as outlined in the Environmental Management Programme attached in Environmental Impact Assessment report must be adhered to at all times	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
d)	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
e)	Appropriate notification sign must be erected at the construction site, warning the public (residents, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
f)	Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of storm water runoff.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
g)	Construction areas (e.g. material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
h)	If any soil contamination is noted at any phase of the proposed activity (ies), the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of this office, and the Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this Department must be informed in this regard.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.1.4 Access roads and traffic impact			
a)	Necessary signage and traffic measures must be implemented for safe and convenient access to the site from adjacent roads.	C	During the site inspection, adequate signage was observed as well as convenient access to the site from adjacent roads.
b)	Access roads must be well maintained throughout the mining operation	C	During site inspection, access roads were well maintained throughout the mine.
8.2.1.5 Air quality management			
a)	Proper measures must be put in place to suppress dust in order to minimize nuisance conditions.	C	Zibulo Colliery: Opencast Mining implements water spraying using water bowsers and enforcing speed limits on site to reduce and manage dust generation.
b)	A speed restriction of 40km/h must be enforced and monitored on site for all mine vehicles.	C	During the site inspection signage indicating a speed limit of 40 km/ hr was observed around site. The auditors were also informed of the 40 km/ hr speed limit during site induction.
8.2.1.6 Proliferation of alien species			
a)	All construction/ mining equipment and vehicles must be cleaned before entering and leaving the site to reduce the chances of spreading weeds and invasive species.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.2.1.7 Noise			
a)	Construction/ mining activities must be limited to normal working hours (7h00 - 17h00), unless the mine is allowed to work 24 hours	C	Zibulo Opencast Colliery operates for 24 hours and it was indicated that the mine is allowed to work for the provisioned times.
b)	Mine vehicles must be fitted with standard silencers prior to beginning of construction.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.1.8 Erosion control measures			
a)	All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed.	C	During the site inspection, no concerns regarding soil compaction was observed.
b)	Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition.	C	It was observed during the inspection that erosion control measures such as berms, energy dissipaters and vegetation stabilisation along certain infrastructure have been incorporated into the designs of linear infrastructure (including railway lines, power lines, conveyors, and pipelines) as well as at points of water discharge. No erosion was observed at the time of inspection.
8.2.1.9 Excavation activities			
a)	Topsoil must be stripped and stockpiled prior to excavation in a designated area.	C	Excavation and management of stockpiles is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During the site inspection, no concerns were noted on the placement of stockpiles. The " <i>Thungela Zibulo Opencast Rehabilitation Plan</i> " (Doc No. G.M.E. 14/18/2/5219, dated October 2023) outlines the current placement of stockpiles at the mine.
b)	Under no circumstances should material stockpiles be disposed of outside the boundary of the mine area.	C	Stockpiling of topsoil is managed in accordance with the " <i>Thungela Resources Rehabilitation Guideline</i> " (Doc No. TR.TECH.TS.025.GL.1, dated 01 December 2021), by stripping the topsoil layer and removing this to the designated topsoil stockpiling area. During the site inspection, no concerns were observed regarding topsoil management.
8.2.1.10 Waste management			
a)	General waste must be kept in containers which are wind and scavenger proof, and disposed of at a permitted landfill site. No temporary dumping and littering of waste is allowed on site.	C	Zibulo Colliery manages waste in accordance with the "Zibulo Colliery Waste Management Procedure" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste separation at source, the use of colour coded waste receptacles with signage indicating the waste type, waste disposal and records keeping. General waste is collected by Fortchportch (Pty) Ltd, who hold a Certificate of Approval issued by Emalahleni Local Municipality Environmental and Waste Management (Permit number. Env 001/2025, dated 22 January 2025). General waste is disposed at Phola Landfill Site, a licenced Waste Disposal Facility.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
b)	No waste must be disposed of through burying and burning.	C	Zibulo Colliery manages waste in accordance with the "Zibulo Colliery Waste Management Procedure" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste separation at source, the use of colour coded waste receptacles with signage indicating the waste type, waste disposal and records keeping. During the site inspection, no evidence of waste burning or burying was noted.
c)	All hazardous waste must be disposed of at an official registered site, or be removed by registered hazardous waste contractors.	C	Zibulo Colliery manages waste in accordance with the "Zibulo Colliery Waste Management Procedure" (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017) which includes the requirements for waste disposal and records keeping. Hazardous waste is collected by Fortchportch (Pty) Ltd - COD to be disposed of at Holfontein and a Safe Disposal Certificate (certificate no. 240906000100002826663, dated 30 January 2025) was provided to the auditors for verification. Holfontein is a licenced Hazardous Waste Disposal Facility, as verified in the "Waste Management Licence for Enviroserv Holfontein Hazardous Waste Disposal Facility" (Licence No. 12/9/11/L975/3 dated 30 May 2013) issued by Department of Environmental Affairs.
d)	An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillage etc) that occur on site must be developed.	C	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements.
8.2.1.11 Surface and groundwater contamination must be prevented and/or mitigated by implementation of the following conditions			
a)	Specific area must be demarcated for fuelling and workshop services. And such area must be banded to reduce the possibility of soil and water contamination.	C	During the site inspection, no concerns regarding demarcation and banding of fuelling and workshop services were noted.
b)	Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.	NC 004	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, hazardous chemical spillages were observed at several areas at the site. - Hydrocarbon spills were observed on the ground with no evidence of spill clean-up measures at the oil drums storage area. An oil leak was also observed at the flanges of the bund overflow pump due to inadequate tightening.
c)	Spillage of petrochemical products must be avoided. In the case of accidental spillage, contaminated soil must be removed for bioremediation or disposed of at a facility for the substance concerned. Disturbed land must be rehabilitated and seeded with vegetation seed naturally occurring on site.	NC 004	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, hazardous chemical spillages were observed at several areas at the site. - Hydrocarbon spills were observed on the ground with no evidence of spill clean-up measures at the oil drums storage area. An oil leak was also observed at the flanges of the bund overflow pump due to inadequate tightening.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
d)	Untreated sewage water must not be discharged directly into the natural environment.	C	During the site inspection, no evidence of untreated sewage discharging into the environment was observed.
8.2.1.12 Fire prevention and management			
a)	Fire extinguishers that are in good working conditions must be made available at all times for their usage during the occurrence of accidental fires	C	During the site inspection, adequate serviced fire extinguishers were available throughout the site, with labels indicating the date of inspection and signature of the inspector.
b)	Workers must be adequately trained in the handling of firefighting equipment.	C	<i>Certificates of Competency</i> issued by Ambu Training, dated 10 May 2023 were availed to the auditors to verify the employees that successfully completed the Emergency Marshall training and are competent in the handling of firefighting equipment.
c)	Open fires must strictly be prohibited.	C	Zibulo Colliery reported that open fires are not permitted on the site and communication was undertaken through toolbox talks.
d)	Smoking must be prohibited in the vicinity of flammable substances.	C	Zibulo Colliery reported that smoking is prohibited in the vicinity of flammable materials and smoking is limited to the designates smoking areas, as communicated to the auditors during site induction. Smoking signs were observed at the designated smoking areas during the site inspection.
e)	Cooking and heating fires must be permitted only in designated areas with appropriate safety measures	C	Zibulo Colliery: Opencast Shaft reported that cooking and heating fires is not permitted on the site and has been communicated to site personnel through toolbox talks.
8.2.1.13 Storm water management			
a)	Storm water management plan must be developed and implemented on site.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
8.2.1.14. Safety			
a)	Potentially hazardous area must be demarcated with danger tape.	C	During the site inspection, hazardous areas such as excavations were demarcated with danger tape, construction netting and warning signage.
b)	Appropriate signage must be placed to caution employees and contractors not to attempt to enter certain structures without being authorised,	C	During the site inspection, hazardous areas such as excavations were demarcated with danger tape, construction netting and warning signage.
8.2.1.15 Emergency Response Plan			
a)	An Emergency Response Plan should be available for accidental spills and firefighting during both construction and operation of the project.	C	The " <i>Zibulo Colliery Emergency Preparedness Procedure</i> " (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
b)	In the event of emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area.	T/N	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. Zibulo Colliery reported that no significant, reportable spillages occurred during the audit period (August 2024 - July 2025).
c)	All significant pollution incidents must be reported to this Department within forty eight (48) hours of occurrences	T/N	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. Zibulo Colliery reported that no significant, reportable spillages occurred during the audit period (August 2024 - July 2025).
8.2.1.16 Compliance with other legislation			
a)	The National Environmental Management Act, 1998 (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said Act.	T/N	Zibulo Colliery has demonstrated sufficient evidence of the application of the National Environmental Management Principles to their activities and activities. The SHE Policy outlines Zibulo Colliery's overarching environmental goals, which includes the continual improvement of environmental performance and is signed by the General Manager, demonstrating the support and commitment by top management.
b)	The National Water Act, 1998 (Act 36 of 1998), with particular reference to the sections pertaining to mining in the proximity of dams and their catchments areas, rivers, marshes, streams, pans and other water courses,	T/N	The DW&S issued Zibulo Colliery opencast mining with Water Use Licences which authorises all water use activities identified at the site in terms of Section 21 of the National Water Act (Act 36 of 1998).
c)	The National Environmental Management Air Quality Act (Act 36 of 2004), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by prospecting activities, into the atmosphere.	T/N	Zibulo Colliery: Opencast implements the "Air Quality Management Plan for the Zibulo Colliery" (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine. Additionally, the Colliery undertakes monthly dust fallout monitoring as well as ambient air quality monitoring and report their annual emissions on the NAEIS.
d)	The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.	T/N	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Zibulo Colliery complies with the requirements of the Conservation of Agriculture Resources Act (Act 43 of 1983),
e)	The National Heritage Resources Act, 1989 (Act No 25 of 1999), with particular reference to the protection of all historical and pre-historical cultural remains.	T/N	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Zibulo Colliery complies with the requirements of the National Heritage Resources Act (Act No 25 of 1999).
f)	The Mine Health and Safety Act, 1996 (Act 29 of 1996) in conjunction with the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), with particular reference to those sections and regulations pertaining to health and safety at mines;	T/N	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Zibulo Colliery complies with the requirements of the Mine Health and Safety Act (Act 29 of 1996)

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	mining within 100 m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.		
g)	All provisions of the Occupational Health and Safety Act, 1993 (Act No.85 of 1993) and any other applicable legislation must be adhered to by the holder of this Authorisation.	N/A	Since Zibulo Colliery is a mine, the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) is not applicable to it.
h)	The National Environmental Management: Waste Act (Act No. 59 of 2008)	T/N	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Zibulo Colliery: North Shaft complies with the requirements of the Waste Act (Act No. 59 of 2008).
8.2.1.17 Liability of the holder of this Authorisation			
a)	The competent authority shall not be held responsible for any damages or losses suffered by the holder or his/her successor in title in any instance where mining/ construction or operation subsequent to construction are to be temporarily or permanently stopped for reasons of non-compliance by the holder with conditions of approval as set out in the document or any other subsequent document emanating from this Authorisation. The holder shall be responsible for all the costs necessary to comply with the above condition unless otherwise specified.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
b)	The contractor must ensure that serviceable ablution facilities are available for employees. It is the responsibility of the holder of the Authorisation to see to it that this condition is adhered to.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.2 MANAGEMENT OF THE ACTIVITY			
a)	A copy of an Environmental Authorisation and EMP must always be available on site so as to monitor compliance with conditions outlined in both the documents. Both documents must be used as on-site reference document during the life of mine.	C	A hard copy of the EMPr was available during the audit and an electronic copy is available on Zibulo Colliery's Shared Drive.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
b)	The Environmental Management Programme (EMP) prepared by Licebo Environmental and Mining (Pty) Ltd must be adhered to during the life of the mine.	C	Zibulo Colliery appointed an Environmental Superintendent to bear overall responsibility for giving effect to the conditions of the EMPr and ensure compliance. Additionally, Zibulo Colliery appoints an independent external auditor to conduct annual audits to verify compliance with the conditions of their EMPr. The conditions of the EMPr are implemented on site and has been audited as part of the current annual external environmental audit. The results of the EMPr audit are provided in Table 4 of this report.
c)	All duties and responsibilities as outlined in the EMPr attached are binding throughout the life of the mine.	T/N	The condition is noted and accepted by Zibulo Colliery (Opencast).
8.2.3 APPOINTMENT OF ENVIRONMENT CONTROL OFFICER			
8.2.3.1	An Environmental Control Officer must be appointed, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the Environmental Authorisation and Environmental Management Programme, prior to any commencement of mining activities on site.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.3.2	The Environment Control Officer appointed must monitor the construction of the infrastructure to ensure that the layout plans are in accordance to the designs and record important findings of the site inspection.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.3.3	The ECO must also monitor the implementation of specific elements of the Environmental Management Programme by contractors.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.3.4	All duties and responsibilities as outlined in the EMPr attached are binding throughout the life of mine	T/N	The condition is noted and accepted by Zibulo Colliery (Opencast).
8.2.4 SITE CLOSURE AND DECOMMISSIONING			
8.2.4.1	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.2.4.2	The holder of EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing,	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	abandonment, cancellation, cessation, relinquishment and completion of the operation.		
8.2.4.3	The application for closure indicated above must be submitted together with all relevant documents as indicated in Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
8.3 MONITORING			
8.3.1	This Department reserves the right to monitor and audit the activity to ensure compliance with legislation and the conditions stipulated in this authorisation.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
8.3.1	It is the holder of this Authorisation's responsibility to ensure that an ongoing management and monitoring of the impacts of the activity on the environment throughout the life of the mine is put into practice.	C	Zibulo Colliery appointed an Environmental Superintendent to bear overall responsibility for giving effect to the conditions of the EMPr and ensure compliance. Additionally, Zibulo Colliery appoints an independent external auditor to conduct annual audits to verify compliance with the conditions of their EMPr. The conditions of the EMPr are implemented on site and has been audited as part of the current annual external environmental audit. The results of the EMPr audit are provided in Table 4 of this report.
8.4 RECORDING AND REPORTING TO THE DEPARTMENT			
8.4.1	Records of monitoring and for auditing must be made available for inspection to this Department and any other relevant authority inspecting the development activities.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
8.4.2	Records relating to compliance and non-compliance with the conditions of this authorisation must be kept in good order. Such records shall be made available to this Department within seven (7) days of receipt of a written request by the Department. Environmental compliance will further be monitored through complaints received from the public.	C	Zibulo Colliery's appointed Environmental Superintendent provided evidence to demonstrate that records relating to the implementation of the Environmental Management Programme are kept on site and on the online SharePoint system where they are safely stored and can be retrievable.
8.4.3	All records relating to the implementation of the Environmental Management Programme must be kept in the office where it is safe and can be retrievable.	C	Zibulo Colliery's appointed Environmental Superintendent provided evidence to demonstrate that records relating to the implementation of the Environmental Management Programme are kept on site and on the online SharePoint system where they are safely stored and can be retrievable.
8.5 NON-COMPLIANCE			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.5.1	In the event of non-compliance by any contractor during the mining/construction of the authorised activity, the holder of this Authorisation will be liable.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
8.5.2	The holder shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
8.5.3	The holder must in the event of non-compliance with any condition of this Authorisation inform the Regional Manager of Mpumalanga region of this Department, in writing, within forty eight (48) hours.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
8.5.4	Non-compliance to this authorisation is an offence as provided for in terms of the National Environmental Management Act, 1998, Section 49(a) and Regulation 48. Any conviction of such offence, may result in Section 49(a) being enforced.	T/N	The condition is noted and accepted by Zibulo Colliery: Opencast.
9. APPEAL OF AUTHORISATION			
9.1	The holder of the authorisation must notify every registered interested and affected party, in writing and within fourteen (14) days of receiving the Department's decision.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
9.2. The notification referred to in 9.1 must —			
9.2.1	Specify the date on which the Authorisation was issued.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
9.2.2	Inform the registered interested and affected parties of the appeal procedure provided for in Chapter 2 of the National Appeal Regulations of 2014.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
9.2.3	Advise the interested and affected parties that a copy of the Authorisation and reasons for the decision will be furnished on request.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
9.2.4	An appeal against the decision must be lodged in terms of Chapter 2 of the National Appeal Regulations of 2014.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).

TABLE 6: ENVIRONMENTAL MANAGEMENT PROGRAMME FOR THE EXTENSION OF MINING ACTIVITIES ON PORTIONS 1G, 21, 41 AND 55 OF THE FARM OOGIESFONTEIN 4 IS AND THE REMAINING EXTENT OF PORTION 12 OF THE FARM KLIPFONTEIN 3 IS ISSUED ON 12 FEBRUARY 2020 WITH REFERENCE NUMBER 30/5/1/2/3/2/1/338 EA

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8. EMPLOYMENT OF WORKERS AND PROCUREMENT OF MATERIALS			
8.1. Social and Labor Plan			
8.1.1	Ensure that recruitment strategies for the mine prioritizes the sourcing of local labour and share in gender equality.	C	The " <i>Thungela Social and Labour Plan, Zibulo Colliery (Ogiesfontein) (MP) 30/5/1/2/2/338 MR (2021 - 2025)</i> " was availed to the auditors. The SLP outlines how the recruitment of local communities are undertaken. Zibulo Colliery: Opencast Mining indicated that the recruitment process and policy is widely communicated through the Job Opportunities page on the Thungela website. To capacitate communities, Zibulo Colliery operates an Adult Education and Training (AET) centre in Phola. Zibulo Colliery employs 30 % of its workforce from Phola, Ogies Kriel and Leandra, which are the surrounding communities. Furthermore, Zibulo Colliery has developed a database of local service providers, and this is used for procurement purposes. The plan further indicated that there is constant engagement with the local businesses in terms of procurement.
8.1.2	Empower the workforce to develop skills that will equip them to obtain employment in other sectors of the economy.		
8.1.3	Contribute to the sustainable development of a community (not dependent on the mine) surrounding the area of operation.		
9. STORAGE OF FUEL, LUBRICANT AND EXPLOSIVES			
9.1. Emergency Response Plan			
9.1.1	To prevent soil contamination and degradation.	NC 004	The " <i>Zibulo Colliery Emergency Preparedness Procedure</i> " (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, hazardous chemical spillages were observed at several areas at the site. - Hydrocarbon spills were observed on the ground with no evidence of spill clean-up measures at the oil drums storage area. An oil leak was also observed at the flanges of the bund overflow pump due to inadequate tightening.
9.1.2	To prevent and minimise negative impacts on surface water resources as a result of hydrocarbon spills.		
9.2. Vehicle Maintenance Plan			
9.1.1	Vehicle Maintenance Plan	C	A Vehicle Maintenance Plan titled " <i>Diesel Maintenance Schedule - Week 46</i> " was provided to the auditors and a Work Order 4009276082 that shows that vehicle maintenance is conducted at Zibulo Colliery was provided to the auditors.
9.3. Stormwater Management Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
9.2.1	To prevent the contamination of the wetland systems and aquatic ecosystems.	C	During the site inspection, it was noted that specific areas were demarcated for fuelling and workshop services. And such areas were observed to be bunded to reduce the possibility of soil and water contamination.
9.3. Aquatic Monitoring Programme			
9.3.1	Aquatic Monitoring Programme	C	Zibulo Colliery: Opencast undertakes Biomonitoring and the " <i>Biomonitoring and Ecotoxicity Assessment Programme for Zibulo Colliery in Mpumalanga Province</i> " (Doc. No. 005, dated November 2024), compiled by Marve Thabi Consulting Engineers (Pty) Ltd as well as the " <i>Zibulo Colliery Aquatic Biomonitoring High Flow Memo Mpumalanga Province South Africa</i> " (Doc. No. 006, dated June 2025) were provided to the auditors.
9.4. Hydrocarbon Management Procedure			
9.4.1	To prevent and minimise groundwater contamination.	NC 004	The " <i>Zibulo Colliery Emergency Preparedness Procedure</i> " (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, hazardous chemical spillages were observed at several areas at the site. - Hydrocarbon spills were observed on the ground with no evidence of spill clean-up measures at the oil drums storage area. An oil leak was also observed at the flanges of the bund overflow pump due to inadequate tightening.
9.5. Groundwater Monitoring Programme			
9.5.1	Groundwater Monitoring Programme	C	Groundwater monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The groundwater water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
10. DRILLING AND BLASTING			
10.1 Mine Plan			
10.1	To minimise fugitive dust generation emanating from drilling activities.	C	The " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Zibulo Opencast Colliery undertakes dust suppression at the mine, making use of bowsers using water from the 1 MI PCD.
10.2. Dust Management Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
10.2.1	To minimise the negative visual impact caused by the removal of overburden by drilling and blasting; and	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Additionally, Zibulo Colliery: Opencast implements the "Air Quality Management Plan for the Zibulo Colliery" (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine.
10.3. Dust Monitoring Programme			
10.3.1	To minimise the negative visual impact caused by dust from the blasting of overburden.	C	An on-going dust fallout monitoring programme is in place at Zibulo Colliery: Opencast. The "Gravimetric Dust Fallout Monitoring Report" (Doc Ref. 22-1734-ECOI), compiled by EcoE Innovative Consulting, were availed for the months between August 2024 - April 2025. Three of the four monitoring points, inclusive of the monitoring point located west of opencast were found to be compliant in terms of the non-residential limit of 1 200 mg/m ² /day. However, the monitoring point located south of the opencast at the Police Station recorded four exceedances of the residential limits during the months of August 2024, September 2024, October 2024 and November 2024 which is a non-compliance as per the National Dust Control Regulations. An investigation was conducted that attributed the exceedances to extensive cultivation on close by agricultural land and significant road upgrades nearby.
10.4. Rehabilitation Plan			
10.4.1	To minimise loss of geological formation	C	The "Thungela Rehabilitation Standard" (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling.
10.5. Stormwater Management Plan			
10.5.1	To prevent the contamination of clean water resources.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
10.6. Blasting Schedule			
10.6.1	To prevent the noise emanating from the blasting activities impacting on surrounding sensitive receptors.	C	The "Zibulo Colliery Perform Opencast Blasting Procedure" (Doc no. ZIB-OM-PRO-0578, dated 06 April 2022) was availed to the auditors and is implemented at the mine. The procedure states that blasting operations be scheduled during day light hours to minimise noise impacts on identified receptors.
10.7. Ground Vibration Monitoring Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
10.7.1	To prevent ground vibrations from impacting on sensitive receptors and from damaging the integrity of structures.	C	The "Zibulo Colliery Noise and Vibration Monitoring Procedure" (ZIB-INV-PRO-0823) was availed during the audit. Additionally, the "Ground Vibration and Air Blast Monitoring for February 2025" (Ref no. BMC_Zibulo_February2025_MGVA, dated 04 March 2025) and "Ground Vibration and Air Blast Monitoring for March 2025" (Ref no. BMC_Zibulo_March2025_MGVA, dated 03 April 2025) were availed to the auditors. The key receptors were identified, and four (4) Instantel Seismographs are permanently fitted on the property and surrounding areas. The Instantel Seismographs are placed in such a way that monitoring covers all the identified receptors. The results of the vibration monitoring programme for the abovementioned period states that no damage was reported from the public and that the blast levels were within the safe blast criteria.
10.7.2	Implementation of blasting buffer zones.		
10.7.3	Air blast monitoring plan.		
10.7.4	To prevent air blast from impacting on the structural integrity of houses and buildings.		
10.7.5	To prevent fly rock from damaging structures, including roads and railways.		
10.7.6	To prevent noxious fumes from impacting on farmsteads and sensitive receptors.		
10.8. Hydrocarbon Management Procedure			
10.8.1	Hydrocarbon Management Procedure and Emergency Preparedness and Response Plan.	C	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, no hazardous chemical spillages relating to drilling and blasting were observed on site.
10.9. Surface water Monitoring Programme			
10.9.1		C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
10.10. Groundwater Monitoring			
	Groundwater Monitoring	C	Groundwater monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The groundwater water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
10.11. Emergency Response Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
10.11.1	To prevent soil contamination and degradation	C	No soil contamination and degradation relating to the drilling and blasting activities was observed at the site during the site inspection.
10.12. Vehicle Maintenance Plan			
10.12.1	Vehicle Maintenance Plan	C	The Vehicle Maintenance Plan was available during the audit and records to verify that vehicle inspection are undertaken to ensure that these are in good working conditions.
10.13. Aquatic Monitoring Programme			
10.13.1	Aquatic Monitoring Programme	C	Zibulo Colliery: Opencast undertakes Biomonitoring and the " <i>Biomonitoring and Ecotoxicity Assessment Programme for Zibulo Colliery in Mpumalanga Province</i> " (Doc. No. 005, dated November 2024), compiled by Marve Thabi Consulting Engineers (Pty) Ltd as well as the " <i>Zibulo Colliery Aquatic Biomonitoring High Flow Memo Mpumalanga Province South Africa</i> " (Doc. No. 006, dated June 2025) were provided to the auditors.
11. COAL REMOVAL, LOADING AND STOCKPILING			
11.1. Dust Management Plan			
11.1.1	To minimise fugitive dust generation emanating from coal extraction activities.	C	The " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Additionally, Zibulo Colliery: Opencast implements the " <i>Air Quality Management Plan for the Zibulo Colliery</i> " (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine.
11.2. Dust Monitoring Programme			
11.2.1	To minimise the negative visual impact caused by mining activities.	C	The " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation.
11.3. Mining Plan			
11.3.1	To minimise fugitive dust generation emanating from drilling activities.	C	The " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Zibulo Opencast Colliery undertakes dust suppression at the mine, making use of bowsers using water from the 1 MI PCD.
11.4. Emergency Response Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
11.4.1	To prevent soil contamination and degradation	C	No soil contamination and degradation relating to the removal, loading and stockpiling of coal was observed at the site during the site inspection.
11.5. Stormwater Management Plan			
11.5.1	To prevent the contamination and sedimentation of clean water resources.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
11.6. Surface Water Monitoring Plan			
11.6.1	Surface Water Monitoring Plan	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
11.7. Regular Vehicle Inspections			
11.7.1	To prevent the noise emanating from mining and vehicular activities impacting on surrounding sensitive receptors.	C	A Vehicle Maintenance Plan was available during the audit and records to verify that vehicle inspection are undertaken to ensure that these are in good working conditions.
11.8. Road Maintenance Plan			
11.8.1	To prevent and minimise the degradation of the road structures resulting in potential health and safety risks and soil erosion.	C	During the site inspection, the Auditors observed roads that were maintained, and no soil erosion was observed along the road infrastructure.
12. DIRTY WATER MANAGEMENT			
12.1. Stormwater Management Plan			
12.1.1	To prevent the contamination of the wetland systems and aquatic ecosystems.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
12.2. Dust Management Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
12.2.1	Dust Management Plan.	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Additionally, Zibulo Colliery: Opencast implements the "Air Quality Management Plan for the Zibulo Colliery" (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine.
13. OPERATION AND MANAGEMENT OF POLLUTION CONTROL DAMS			
13.1. Stormwater Management Plan			
13.1.1	To prevent the contamination of the wetland systems and aquatic ecosystems.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
13.2. Dust Management Plan.			
13.2.1	Dust Management Plan.	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Additionally, Zibulo Colliery: Opencast implements the "Air Quality Management Plan for the Zibulo Colliery" (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine.
13.3. Dust Monitoring Programme.			
13.3.1	Dust Monitoring Programme.	C	An on-going dust fallout monitoring programme is in place at Zibulo Colliery: Opencast. The "Gravimetric Dust Fallout Monitoring Report" (Doc Ref. 22-1734-ECOI), compiled by EcoE Innovative Consulting, were availed for the months between August 2024 - April 2025. Three of the four monitoring points, inclusive of the monitoring point located west of opencast were found to be compliant in terms of the non-residential limit of 1 200 mg/m ² /day. However, the monitoring point located south of the opencast at the Police Station recorded four exceedances of the residential limits during the months of August 2024, September 2024, October 2024 and November 2024 which is a non-compliance as per the National Dust Control Regulations. An investigation was conducted that attributed the exceedances to extensive cultivation on close by agricultural land and significant road upgrades nearby.
13.4. Aquatic Monitoring Programme			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
13.4.1	Aquatic Monitoring Programme	C	Zibulo Colliery: Opencast undertakes Biomonitoring and the " <i>Biomonitoring and Ecotoxicity Assessment Programme for Zibulo Colliery in Mpumalanga Province</i> " (Doc. No. 005, dated November 2024), compiled by Marve Thabi Consulting Engineers (Pty) Ltd as well as the " <i>Zibulo Colliery Aquatic Biomonitoring High Flow Memo Mpumalanga Province South Africa</i> " (Doc. No. 006, dated June 2025) were provided to the auditors.
13.5. Groundwater Monitoring Programme			
13.5.1	To prevent and minimise groundwater contamination.	C	Groundwater monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
14. STOCKPILE OPERATION AND MAINTENANCE			
14.1. Dust Management Plan			
14.1.1	To minimise fugitive dust generation emanating from the operation and management of stockpiles.	C	The " <i>Zibulo Colliery Air Quality Monitoring Procedure</i> " (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was availed during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Additionally, Zibulo Colliery: Opencast implements the " <i>Air Quality Management Plan for the Zibulo Colliery</i> " (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine.
14.2. Mining Plan			
14.2.1	To minimise topography change and disruption of surface water flow.	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
14.3. Stormwater Management Plan			
14.3.1	To prevent soil erosion.	C	It was observed during the inspection that erosion control measures such as berms, energy dissipaters and vegetation stabilisation along certain infrastructure have been incorporated into the designs of linear infrastructure (including railway lines, power lines, conveyors, and pipelines) as well as at points of water discharge. No soil erosion issues were noted at the time of inspection.
14.4. Soil Rehabilitation Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
14.4.1	Soil Rehabilitation Plan.	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
14.5. Aquatic Monitoring Programme			
14.5.1	To prevent the contamination and sedimentation of the wetland systems and aquatic ecosystems	C	Zibulo Colliery: Opencast undertakes Biomonitoring and the " <i>Biomonitoring and Ecotoxicity Assessment Programme for Zibulo Colliery in Mpumalanga Province</i> " (Doc. No. 005, dated November 2024), compiled by Marve Thabi Consulting Engineers (Pty) Ltd as well as the " <i>Zibulo Colliery Aquatic Biomonitoring High Flow Memo Mpumalanga Province South Africa</i> " (Doc. No. 006, dated June 2025) were provided to the auditors.
14.6. Surface Water Monitoring Plan			
14.6.1	Surface Water Monitoring Plan	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
14.7. Groundwater Monitoring Programme			
14.7.1	To prevent and minimise groundwater contamination.	C	Groundwater monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
15. WASTE AND SEWAGE GENERATION AND DISPOSAL			
15.1. IWWMP			
15.1.1	To minimise topography change; and	C	The " <i>Updated Integrated Water and Waste Management Plan for Zibulo Colliery (Opencast)</i> " (April 2024), compiled by MarveThabi Consulting Engineers was availed during the audit. The IWWMP has identified all relevant water and waste issues and risks, with associated strategies and action plans to address them.
15.1.2	To minimise the negative visual impact caused by waste stored on site.		
15.1.3	To monitor waste generation as result of mining.		
15.2. Stormwater Management Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
15.2.1	To prevent the contamination of clean water resources.	NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the channel, resulting in no separation between clean and dirty water at the site.
15.3. Surface Water Monitoring Plan			
15.3.1	Surface Water Monitoring Plan	C	Surface water monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
15.4. Groundwater Monitoring Programme			
15.4.1		C	Groundwater monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the "Zibulo Colliery - Quarterly Water Quality Results" (July 2024 - September 2024) and "Zibulo Colliery - Quarterly Water Quality Results" (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
16. CONCURRENT REHABILITATION			
16.1. Dust Management Plan			
16.1.1	To minimise fugitive dust generation emanating from concurrent rehabilitation activities.	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was available during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Additionally, Zibulo Colliery: Opencast implements the "Air Quality Management Plan for the Zibulo Colliery" (Ref No. 20AAC13, dated May 2022) compiled by Airshed at the mine.
16.2. Mining Plan			
16.2.1	To minimise fugitive dust generation emanating from drilling activities.	C	The "Zibulo Colliery Air Quality Monitoring Procedure" (Doc No. ZIB-ENV-PRO-0791, dated 25 October 2019) was available during the audit. The procedure covers the management and monitoring of fallout dust and particulate matter at Zibulo Opencast Operation. Zibulo Colliery Opencast undertakes dust suppression at the mine, making use of bowsers using water from the 1 MI PCD.
16.3. Rehabilitation Plan			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
16.3.1	To rehabilitate the topography;	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
16.3.2	To minimise soil erosion and topsoil loss; and	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
16.3.3	To restore vegetation establishment; and	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
16.3.4	To rehabilitate the area to an adequate state, thereby preventing sustained potential impacts from occurring.	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
16.3.5	To prevent and minimise groundwater contamination.	C	The " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021) and the requirements for stripping, excavation, stockpiling, re-vegetation and profiling was made available to the auditor.
16.4. Emergency Response Plan			
16.4.1	To prevent soil contamination and degradation.	C	The "Zibulo Colliery Emergency Preparedness Procedure" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements.
16.5. Vehicle Maintenance Plan			
16.5.1	Soil Rehabilitation Plan; and Soil monitoring.	C	A Vehicle Maintenance Plan was not available during the audit nor records to verify that vehicle inspection are undertaken to ensure that these are in good working conditions.
16.5.2	To prevent soil degradation and the decrease in land capability.		
16.6. Alien Invasive Management Plan			
16.6.1	To prevent the influx and establishment of alien invasive vegetation.	NC 011	During site inspection, Substantial growth of AIPS were observed around the South Pit area, including the slopes of the safety berms. Zibulo Colliery: Opencast has appointed a registered service provider to eradicate Alien Invader species at Zibulo opencast. The Scope of work and pest control operator registration certificate were provided to the auditors.
16.7. Groundwater Monitoring Programme			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
16.7.1	Groundwater Monitoring Programme	C	Groundwater monitoring was undertaken at Zibulo Colliery: Opencast Mining during the audit period. The surface water monitoring results were recorded in the " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (July 2024 - September 2024) and " <i>Zibulo Colliery - Quarterly Water Quality Results</i> " (October 2024 - December 2024), as well as the <i>Certificates of analysis</i> for the periods January 2025 to June 2025 as compiled by Integral Laboratories (Pty) Ltd.
16.7.2	Drilling and testing of monitoring boreholes targeting the backfilled areas.		
16.8. Regular Vehicle Inspections			
16.8.1	To prevent the noise emanating from rehabilitation machinery and vehicles impacting on surrounding sensitive receptors.	C	A Vehicle Maintenance Plan was provided to the auditor to verify that vehicle inspection are undertaken to ensure that the vehicles are in good working conditions.

5. SUMMARY OF RESULTS

This section provides a summary of the results of the annual external environmental performance assessment (2024 - 2025) conducted at Zibulo Colliery: Opencast from 24 – 26 June 2025 as detailed in Section 4 (Tables 3 - 6).

5.1. NON-COMPLIANCES

Eleven (11) non-compliances with conditions of the EA and EMPr were raised for the assessment period (2024 – 2025). A summary of the non-compliances is provided in Table 7.

5.2. ACTIONS TO ADDRESS THE NON-COMPLIANCES

Zibulo Colliery: Opencast developed an action plan to address the non-compliances with EA and EMPr conditions and the proposed corrective/ preventative measures, responsible persons and target date are included in Table 7.

Implementation and effectiveness of actions to address the non-compliances will be evaluated during the next annual external environmental performance assessment.

5.3. RECOMMENDATIONS TO AMMEND THE ENVIRONMENTAL MANAGEMENT PROGRAMME

The EMPrs provides adequate mitigation measures for avoiding, managing and mitigating environmental impacts associated with Zibulo Colliery: Opencast's authorised activities. In terms of Section 34(4) of the EIA Regulations (GN R984 of 2014), no recommendations are made to amend the conditions of the EMPrs.

TABLE 7: SUMMARY OF NON-COMPLIANCES AND ACTION PLAN

NC No.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADDRESS NON-COMPLIANCE	RESPONSIBLE PERSON	TARGET DATE
<p>NC 001</p>	<p>The ECA (Act 73 of 1989) provides the requirements for environmental noise monitoring of disturbing noise and nuisance noise in accordance with the National Noise Control (NCC) Regulations (GN R154 of 10 January 1992) and using the methodology in SANS 10103: 2008: The Measurement and Rating of Environmental Noise with Respect to Annoyance and to Speech Communication. Furthermore, where noise levels exceed the limits in the NNC Regulations (GN R154 of 1992), the noise source must be identified and mitigation measure must be implemented.</p> <p>Although Zibulo Colliery undertakes occupational noise monitoring and monitoring in terms of ground vibration and air blast, this does not meet the requirements of the recommended Environmental Noise Monitoring in terms of the NCC Regulations (GN R154 of 1992) under the ECA (Act 73 of 1989). In this regard, although there is no legal requirement to undertake environmental noise monitoring, the only manner within which to verify compliance with the prescribed limits is to undertake an environmental noise assessment, even on a once off basis.</p>	<p>Appoint an accredited environmental noise specialist to conduct an environmental noise assessment (once-off). Review findings and implement required mitigation measures. Include noise monitoring requirements into the annual monitoring plan.</p>	<p>Environmental Superintendent</p>	<p>July 2026</p>
<p>NC 002</p>	<p>Zibulo Colliery: Opencast Mining implements water spraying using water bowsers and enforcing speed limits on site to</p>	<p>Procure approved dust-allaying agent product. Apply dust-allaying agent</p>	<p>Procurement officer, mining</p>	<p>May 2026</p>

NC No.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADDRESS NON-COMPLIANCE	RESPONSIBLE PERSON	TARGET DATE
	reduce and manage dust generation. However, Zibulo Colliery: Opencast Mining does not spray topsoil and subsoil with a dust allaying agent immediately after being stockpiled.	immediately after stockpiling. Implement a checklist for soil stockpile treatment.	manager and environmental officer	
NC 003	Revegetation is undertaken in accordance with the " <i>Thungela Rehabilitation Standard</i> " (Doc No. TR.TECH.TS.025, dated 08 November 2021). During site inspection, it was observed that only the topsoil stockpiles are revegetated. The rest of the stockpiles and berms are not revegetated.	Conduct survey to identify all unvegetated stockpiles and berms. Implement rapid-growth revegetation programme per Thungela Standard. Monitor and report revegetation progress monthly.	Environmental team and mining manager	October 2026
NC 004	<p>The "<i>Zibulo Colliery Emergency Preparedness Procedure</i>" (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018) was availed during the audit and outlines the procedure for clean-up of minor and major spillages, as well the internal and external reporting requirements. However, during the site inspection, hazardous chemical spillages were observed at several areas at the site.</p> <p>- Hydrocarbon spills were observed on the ground with no evidence of spill clean-up measures at the oil drums storage area. An oil leak was also observed at the flanges of the bund overflow pump due to inadequate tightening.</p>	Train workshop and field staff on spill response procedures. Place spill kits at all high-risk zones (e.g., pump areas, oil storage). Immediately clean existing spills and dispose contaminated soil appropriately. Conduct weekly inspections for spills.	Training facilitators, environmental officer and workshop supervisor	Immediately
NC 005	During the site inspection, it was noted that the clean stormwater channel, which was meant to divert clean water around the site, has been removed. Material containing carbonaceous material has instead been placed in the	Reconstruct clean stormwater diversion channel according to design. Remove carbonaceous material currently blocking	Mining Manager and surface engineering	June 2026

NC No.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADDRESS NON-COMPLIANCE	RESPONSIBLE PERSON	TARGET DATE
	channel, resulting in no separation between clean and dirty water at the site.	channel. Introduce quarterly inspections of stormwater systems.		
NC 006	<p>Zibulo Colliery: Opencast Mining reported that all PCD are lined and monthly water dam inspections are conducted to assess key aspects that influence the effectiveness of the pollution control dams. The following reports were provided to the auditors: <i>Thungela 9 MegL Dam Monthly Inspection Supporting Document, dated 18 November 2024, Thungela 40 Meg Dam Monthly Inspection Supporting Documents, dated 18 November 2024, Thungela 9 Meg Litre Dam Monthly Inspection Supporting Document, dated 06 February 2025, and Thungela 40 Meg Dam Monthly Inspection Supporting Documents, dated 06 February 2025.</i> The pollution control dams are further inspected during the monthly Environmental Inspections which are conducted by the environmental team. Additionally, a Bathymetric Survey was conducted by Kago Entle Group and the results thereof were documented in the report titled <i>Bathymetric surveys and orthophoto mapping of Thungela Dams</i>, dated April 2025. The aforementioned survey's main purpose is to provide actionable insights for dam management, environmental compliance and infrastructure planning to assist in ensuring that the PCD's maintain their effectiveness. However, it was</p>	<p>Develop a desilting plan based on bathymetric survey results. Appoint contractor to remove silt and weeds. Conduct post-desilting inspection. Maintain monthly inspections and annual bathymetric surveys.</p>	Environmental officer and surface engineering	July 2026

NC No.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADDRESS NON-COMPLIANCE	RESPONSIBLE PERSON	TARGET DATE
	observed during the site inspection and reported in the Bathymetric survey that the 9 ML PCD is heavily silted, resulting in overgrowth of weeds. This undermines the abovementioned measures implemented to maintain the effectiveness of the PCD (i.e. the monthly inspections and bathymetric survey).			
NC 007	Zibulo Colliery: Opencast Mining implements water spraying making use of bowsers using water from the 1 MI Dam PCD and enforcing speed limits on site to reduce and manage dust generation. However, the water used is not treated with Dust-aside or a similar product.	Procure Dust-aside or equivalent dust suppressant. Implement routine dust suppression on haul roads. Update dust management SOPs to include suppressants.	Environmental Superintendent, mining manager	May 2026
NC 008	Although Zibulo Colliery appoints an independent external auditor to conduct annual audits to verify compliance with the conditions of their EAs and Environmental Management Programmes (EMPRs) and the non-compliances with conditions of the EA and EMPr identified during the audit are reported to the DMRE, such non-compliances are not reported to the DMRE within the specified 24 (twenty-four) hours.	Implement a 24-hour incident notification system (SMS/email template). Train environmental staff on mandatory reporting timelines. Maintain log of all reported non-compliances.	Environmental team and training facilitator	Immediately
NC 009	During site inspection, no indigenous tree screen was observed around the mine and infrastructure areas. Zibulo Colliery indicated that there is no space to plant trees on the mine boundary as this is municipal land. However, these	Identify alternative internal planting zones (e.g., buffer zones, facility perimeters). Develop and approve indigenous tree planting plan. Implement planting	Environmental team	September 2026

NC No.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADDRESS NON-COMPLIANCE	RESPONSIBLE PERSON	TARGET DATE
	constraints do not remove the obligation to comply with the condition.	programme. Monitor survival rate and replace dead trees.		
NC 010	Zibulo Colliery: Opencast implements a 40km/hour limit on roads within the site. Signages pertaining to the maximum speed limits are strategically placed around the mine.	Update signage to reflect 30 km/h requirement. Update speed control SOP and driver induction materials. Enforce compliance through random spot checks.	Safety officer and Transport/Logistics Supervisor	July 2026
NC 011	During site inspection, Substantial growth of AIPS were observed around the South Pit area, including the slopes of the safety berms. Zibulo Colliery: Opencast has appointed a registered service provider to eradicate Alien Invader species at Zibulo opencast. The Scope of work and pest control operator registration certificate were provided to the auditors.	Deploy the appointed invasive species contractor to begin removal. Prioritise high-risk areas (South Pit, safety berm slopes). Implement follow-up chemical treatment / mechanical removal cycle. Rehabilitate cleared areas with indigenous grasses. Maintain an AIPS register with GPS points, photos and updated status. Conduct quarterly monitoring for regrowth.	Environmental team	May 2026

6. CONTINUAL IMPROVEMENT

The previous annual external environmental performance assessment (2023 – 2024) was conducted on 05 – 08 August 2024 and the results were reviewed in the "*Zibulo Colliery: Opencast Annual External Environmental Performance Assessment Report (2023 – 2024)*" compiled by NTC Group (Pty) Ltd.

Non-compliances with conditions of the EAs and EMPs raised in the previous annual external environmental performance assessment (2023 – 2024) have been addressed and rectified. Three (3) repeat non-compliances occurred for the current assessment period (2024 – 2025).

Areas of improvement are evident through the closure of a number of previous findings. This reflects a degree of continuous improvement, however, further effort and consistent implementation of corrective actions are required to achieve full compliance and prevent repeat non-compliances.

Zibulo Colliery: Opencast demonstrated the implementation of environmental management measures based on the documentation reviewed and observations during the site inspection for the current assessment period (2024 – 2025) and is encouraged to continually improve its environmental performance and compliance with conditions of the EA and EMP.

7. CONCLUSION

Zibulo Colliery: Opencast largely complies with the conditions of the EA and EMPs. Eleven (11) non-compliances with conditions of the EAs and EMPs were raised in the external environmental performance assessment (2024 - 2025) conducted on 24 – 26 June 2025.

The environmental impacts resulting from the non-compliances with EA and EMP conditions are deemed to be limited in nature and extent. Furthermore, the corrective/ preventative measures provided by Zibulo Colliery: Opencast to address the non-compliances can be affected within a short timeframe. The implementation and effectiveness of actions to address the non-compliances will be evaluated during the next annual external environmental performance assessment.

The assessment team concludes that Zibulo Colliery: Opencast implements effective environmental management practices. The EA, EMP and documentation reviewed during the assessment provides sufficient measures to avoid, manage and mitigate environmental impacts associated with Zibulo Colliery: Opencast's activities, if adhered to.

Zibulo Colliery: Opencast is commended for the proactive approach and effective management of the

environment. The assessment team would also like to thank Zibulo Colliery: Opencast for their cooperation, transparency and the hospitality extended during the external environmental performance assessment.

8. REFERENCES

- Environmental Authorisation (Ref. 17/2/2/2 NK-1) for Zibulo Colliery: Opencast dated 30 April 2010 for the development of an activity, including structures and infrastructure, where the total area of the developed area is, or is intended to be, 20 Hectares or more, on Portions 12,19,39,40 and 41 of the Farm Oogiesfontein 4IS.
- Environmental Management Programme (Ref. MP/30/5/1/2/2/338 MR) 10 January 2010 for Zibulo Colliery: Opencast Oogiesfontein.
- Environmental Authorisation (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast 12 February 2020 for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining extent of Portion 12 of the Farm Klipfontein 3 IS.
- Environmental Management Programme (Ref. 30/5/1/2/3/2/1/338 EA) for Zibulo Colliery: Opencast 12 February 2020 for the extension of mining activities on Portions 19, 21, 41 and 55 of the Farm Oogiesfontein 4 IS and the remaining Extent of Portion 12 of the Farm Klipfontein 3 IS.
- Thungela Zibulo Colliery: Opencast, Annual External Environmental Performance Assessment Report (2023 - 2024) (January 2024) compiled by NTC Group (Pty) Ltd.
- Incident and Non-Conformance Reporting Procedure (Doc No. ZIB-ENV-PRO-0814 , dated 10 November 2017).
- Zibulo Competency Training and Authority Procedure (Doc No. ZIB-ENV-PRO-0805, dated 10 October 2017).
- Zibulo Environmental Induction (Doc No. V5) .
- Safe Disposal Certificates.
- Zibulo Colliery Waste Management Procedure (Doc No. ZIB-ENV-PRO-0835, dated 10 November 2017).
- Waste Management Licence for Enviroserv Holfontein Hazardous Waste Disposal Facility (Licence No. 12/9/11/L975/3 dated 30 May 2013).
- Thungela Resources Rehabilitation Guideline (Doc No. TR.TECH.TS.025.GL.1, dated 01 December 2021).
- Thungela 9 MegL Dam Monthly Inspection Supporting Documents.
- Thungela 40 Meg Dam Monthly Inspection Supporting Documents.
- Draft 2024 Pre-grass Rehabilitation Surveys (dated 29 March 2024).
- Zibulo Colliery Emergency Preparedness Procedure (Doc No. ZIB-ENV-PRO-0808, dated 30 January 2018).

- Gravimetric Dust Fallout Monitoring Report (Doc Ref. 22-1734-ECOI), compiled by EcoE Innovative Consulting.
- Thungela Social and Labour Plan, Zibulo Colliery (Ogiesfontein) (MP) 30/5/1/2/2/338 MR (2021 - 2025).
- Thungela Zibulo Opencast Topsoil Management Plan dated April 2023.
- Draft Zibulo Colliery 2024 Rehabilitation Assessment dated 29 March 2024 drafted by Agreeenco Environmental (Pty) Ltd.
- Soil chemical status evaluation and fertilizer recommendation (Report No. RG/2025/01/07/1, dated 27 December 2024).
- Thungela Resources Zibulo Colliery Water Balance Report (Ref no. 41106601-REP-00002, dated April 2025).
- Zibulo Colliery - Quarterly Water Quality Results.
- Zibulo Colliery Water Balance Report (Ref no. 41106601-REP-00002, dated April 2025).
- Zibulo Colliery Air Quality Monitoring Procedure (ZIB-ENV-PRO-0791).
- Air Quality Management Plan for the Zibulo Colliery (Ref No. 20AAC13, dated May 2022) compiled by Airshed.
- Comments on restrictions and conditions regarding the mining operations under or within a horizontal distance of 100 metres from surface structures and objects to be protected: Regulation 17(6)(a), 17(7)(a) and 17(9)(a) of the mine health and safety act, (Act 29 of 1996)" (Ref: MP11/18/2-N2530281/25, dated 08 September 2025).
- Zibulo Colliery Noise and Vibration Monitoring Procedure (Doc no. ZIB-INV-PRO-0823, dated 10 November 2017).
- Zibulo Colliery Noise and Vibration Monitoring Procedure (Doc no. ZIB-INV-PRO-0823, dated 10 November 2017).
- Ground Vibration and Air Blast Monitoring Reports.
- Zibulo Colliery Blast Radius Plan Material" (dated March 2025).
- Delivery Note Customer copy / dangerous goods declaration.
- Zibulo Colliery Perform Opencast Blasting Procedure (Doc no. ZIB-OM-PRO-0578, dated 06 April 2022).
- Biomonitoring Reports: Biomonitoring and Ecotoxicity Assessment Programme for Zibulo Colliery in Mpumalanga Province.

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, **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: **11 DECEMBER 2025**

The Environmental Assessment Practitioner General declaration:

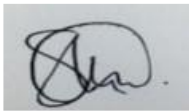
I, **ASANDA SHOBEDE**, declare that –

- 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**

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

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).



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



ASANDA SHOBEDE

Company: NTC Group (Pty) Ltd

Candidate EAP(2023/6575)

Mobile: +27 76 931 6055

Email: asanda@ntcgroup.co.za

BRIEF PROFILE

Asanda holds a BSS in Geography and Environmental Management. She is a proactive and detail-oriented young professional with two years of experience in administration, demonstrating strong organizational and communication skills. Adept at managing office operations, coordinating schedules, and supporting team projects to ensure seamless workflow.

Well-developed skills: GIS| Microsoft Office| EIA| Stakeholder liaison| Environmental licensing & permitting| Water Use License Application

PROFESSIONAL QUALIFICATIONS

2021: University of KwaZulu Natal, BSS Geography and Environmental Management

PROFESSIONAL AFFILIATIONS

EAPASA(2023/6575)

PROJECT EXPERIENCE

- Environmental Management Programme reports,
- Water Use license processes,
- Environmental Authorisation
- Environmental Impact Assessments
- Stakeholder Engagement
- Environmental Compliance Auditing