

ENVIRONMENTAL AUDIT REPORT

*In terms of Regulation 34 of the EIA Regulations, 2014
GN R 982 of 8 December 2017, as Amended*

REPORT DATE: 12 September 2025

AUTHORISATION REFERENCE: GP 30/5/1/1/2 (10448) PR

PROJECT REFERENCE: 2513_BEN-SOU Environmental Audit

COMPILED FOR:

Robert Russel
K2015073261 (South Africa) (Pty) Ltd

011 234 7976 | robert@capitalsensetld.com

COMPILED BY:

Candis Lubbe (*Pri. Sci. Nat. 116831*)
ENVIROMIN PROJECTS

084 371 0123 | info@envirominprojects.co.za | www.envirominprojects.co.za



Table of Contents

1	INTRODUCTION	1
1.1	Auditors	1
1.2	Location	1
1.3	Site Activities	3
1.4	Progress of Prospecting Activities.....	3
2	SCOPE OF ENVIRONMENTAL AUDIT	3
2.1	Objectives of the Environmental Audit Report	3
2.2	Content of Environmental Audit Report.....	4
2.3	Scope of Work	4
3	METHODOLOGY	5
3.1	Procedure	5
3.2	Evaluation Criteria	5
3.3	Recommendations	6
4	ASSUMPTIONS, UNCERTAINTIES AND KNOWLEDGE GAPS	7
5	PUBLIC CONSULTATION.....	7
6	EVALUATION AND ASSESSMENT.....	8
7	RECOMMENDATIONS & ACTIONS	33
7.1	Feedback from Findings of Previous Audit	33
7.2	Summary of Recommendations of Current Audit	33
8	SITE PHOTOS	35
9	APPENDICES.....	36
9.1	Declaration of Lead Auditor	37
9.2	Acceptance of Performance Assessment by Client.....	38
9.3	Experience & Expertise of Auditor.....	39
9.4	Progress Report – Proof of Submission 2023-24.....	40
9.5	Comments Received	41

List of Tables

Table 1: Audit Personnel.....	1
Table 2: Details of the Independent Auditor.	1
Table 3: Report Outline.....	4
Table 4: Description of scoring during evaluation of the findings.....	5
Table 5: Types of recommended actions required.....	6
Table 6: Summary of the findings of the assessment of management measures contained in the EMPr and conditions of the Environmental Authorisation.....	8
Table 7: Assessment/evaluation of the management measures contained in the EMPr and conditions of the Environmental Authorisation.	13
Table 8: Recommendations and action plan.	33

List of Figures

Figure 1: Location of the prospecting right area of the Benoni South Project (New Kleinfontein and Turnbridge Section) in relation to major roads.	2
---	---

List of Photos

None.

1 INTRODUCTION

An environmental authorisation (Ref. GP30/5/1/1/2 (10448) PR) was granted on the 13th November 2019 and subsequently the Prospecting Right was granted for Gold and Uranium Ore to K2015073261 (South Africa) (Pty) Ltd by the Department of Mineral Resources and Energy (DMRE) on the 14th October 2021. The prospecting right refers to New Kleinfontein and Turnbridge Sections detailed in Section 1.2 and is referred to as the Benoni South Gold Project.

Subsequently, **Enviromin Projects** have been appointed as the independent auditor to ensure that compliance is achieved with the conditions of the authorisation and management measures contained within the Environmental Management Programme (EMPr).

1.1 Auditors

An assessment was undertaken by Candis Lubbe on the 28th August 2025, details indicated in Table 1 and Table 2. The last assessment was undertaken on 29th November 2021.

Table 1: Audit Personnel.

Enviromin Projects Team	Benoni South Gold Project Personnel
<i>Lead Auditor: Candis Lubbe</i>	<i>Project Manager: Sean Meadon</i>

Table 2: Details of the Independent Auditor.

Name	Candis Lubbe
Qualifications	BSc (Honours) Ecology, Environment and Conservation
EAPASA	2021/3700
Other Affiliations	SACNASP ¹ Pr. Sci. Nat. 116831 ELA ² 2021/469/GP IAIA ³ 6800
Work Experience	19 years environmental consulting

1.2 Location

The Benoni South Gold Project is located at Erf 1750, 1751 and 1761 of Actonville; Various Portions of Erven of Apex, Asiatic Bazaar Benoni, Kleinfontein Lake, Larrendale, Leachville; Portions 01, 13, 250, 252, 254, 307,319, 337, 385 and 390 of the farm Kleinfontein 67 IR; Portions 07, 17, 20, 39, 43, 44, 77 and the Remaining Extent of the farm Benoni 77 IR; Portions 06, 09, 13, 36, 46, 52, 68, 84, 85, 90, 97, 103, 105, 110, 160, 162, 163, 169 and the Remaining Extent of the farm Rietfontein 115 IR; Portion 46 of the farm Vlaktefontein 69 IR and Erf 3266 of Wattville, in the Magisterial District of Springs, Gauteng Province. Refer to Figure 1 for an overview of the location of the prospecting area.

¹ South African Council for Natural Scientific Professions

² Environmental Law Association

³ International Association Impact Assessment

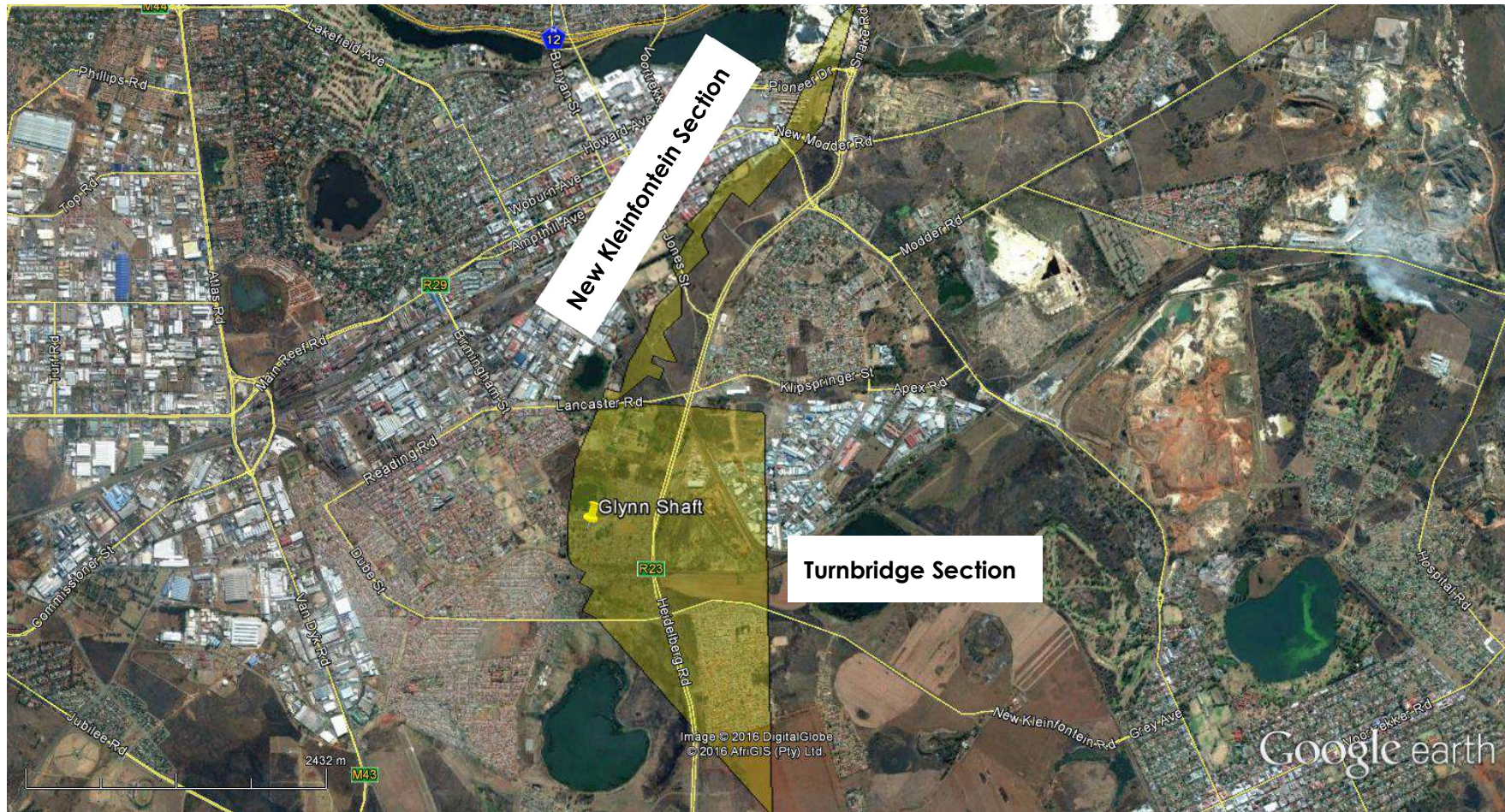


Figure 1: Location of the prospecting right area of the Benoni South Project (New Kleinfontein and Turnbridge Section) in relation to major roads.

1.3 Site Activities

The holder of the Authorisation⁴ is authorised to undertake the following activities listed in the EIA Regulations:

- **GN R 983 Item 20:** Any Activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), including associated infrastructure, structures and earthworks, directly related to the extraction of a mineral resource"
- **GN R 983 Item 27:** The clearance of an area of 1 hectare or more, but less than 29 hectares of indigenous vegetation.

Detailed specifications of activities are as follows:

- Fencing off an area of 50 x 50m area in the direct vicinity of the inclined shaft;
- The fenced off area will be cleared of any vegetation cover;
- Hard rock drilling using conventional underground drilling rigs;
- Placement of temporary mobile office and portable toilet on site within the fenced off area;
- A total of 30 boreholes will be drilled underground; and
- Each borehole will be approximately 200mm in size.

The environmental audit report must provide for recommendations regarding the need to amend the EMP, and where applicable, the closure plan.

1.4 Progress of Prospecting Activities

Progress reports have been completed in accordance with the requirements of the DMRE and covers prospecting activities carried out with respect to the Benoni South Gold Project prospecting area for the following periods:

- Year 1 (2020/2021) – dated 14 November 2021
- Year 2 (2021/2022) – dated 14 November 2022
- Year 3 (2022/2023) – dated 14 November 2023
- Year 4 (2023/2024) – dated 14 November 2024

2 SCOPE OF ENVIRONMENTAL AUDIT

2.1 Objectives of the Environmental Audit Report

The objective of the environmental audit report is to:

- Report on the level of compliance with the conditions of the environmental authorisation and the EMP; and the extent to which the avoidance, management and mitigation measures provided for in the EMP and achieve the objectives and outcomes of the EMP
- Identify and assess any new impacts and risks as a result of undertaking the activity
- Evaluate the effectiveness of the EMP
- Identify shortcomings in the EMP
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMP.

⁴ K2015073261 (South Africa) (Pty) Ltd

2.2 Content of Environmental Audit Report

The contents of this Environmental Audit Report has been compiled according to the prescribed legal requirements contained in Appendix 7 of the EIA Regulations, 2014 as indicated in Table 3 below.

Table 3: Report Outline.

Content of Environmental Audit Reports	Reference in Report
a) Details of the – i. Independent person who prepared the environmental audit report; and ii. Expertise of the independent person that compiled the environmental audit report	Section 1.1 Section 9.3 Table 2
b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority	Section 9.1
c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared	Section 2.3
d) A description of the methodology adopted in preparing the environmental audit report	Section 3
e) An indication of the ability of the EMPr to – i. Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis ii. Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility iii. Ensure compliance with the provisions of the environmental authorisation, EMPr	Section 6
f) A description of any assumptions made, and any uncertainties or gaps in knowledge	Section 4
g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report	Section 5
h) A summary and copies of any comments that were received during any consultation processes	Section 5 Section 9.5
i) Any other information requested by the competent authority	Not Applicable

2.3 Scope of Work

Enviromin Projects has been appointed to implement the Auditing Services required to assess whether the licence holder is compliant with the conditions and management measures stipulated within the environmental authorisation and EMPr. Therefore, the scope of work includes the following key tasks:

Site Assessments: although site inspections are usually conducted as part of environmental audits, this was not included as part of the scope of work as the prospecting programme only includes non-invasive activities and due to covid

pandemic original prospecting plans were delayed. In addition, the current area is being illegally undermined and is considered highly dangerous.

Evaluation of Documents: as a result of no site assessment being undertaken and delayed prospecting activities the past prospecting progress reports have been reviewed and considered as pertinent information to this audit.

Reporting: a brief summary of the results of the compliance assessment will be drawn up and a set of recommendations/actions required to achieve further compliance will be provided as well as contain actions on guidance for implementation of the conditions.

3 METHODOLOGY

3.1 Procedure

The following methodology or procedure was used for assessment of the prospecting area:

- **Site Inspection:** no site assessment was undertaken due to non-invasive prospecting activities and current illegal mining activities being undertaken.
- **Documentation Review:** a documentation review was undertaken of all annual progress reports for the last 4 years.

3.2 Evaluation Criteria

During the assessment, compliance with the following is evaluated:

- Management measures stipulated in the documents;
- Environmental monitoring required (if applicable);
- Legal requirements; and
- Best practice observations.

The scores and descriptions used in the evaluation of the EMPr are indicated in Table 4. Recommended actions where required have been provided (refer to Section 7).

Table 4: Description of scoring during evaluation of the findings.

Score	Evaluation	Description
0	Major Non-Compliance	Relates to the absence of a requirement needed to be implemented. Several minor non-compliances listed against the same requirement may represent a total breakdown of a process and thus could collectively be a major non-compliance.
10	Minor Non-Compliance	The requirement is partially implemented or non-compliant.
20	Observation	Relates to a matter about which the Assessor is concerned but which cannot be clearly stated as non-compliance. Observations also indicate trends which may result in a future non-compliance.
30	Compliant	The project management plans and procedures are executed in a managed in a systematic procedure producing the desired outcome or objective.
N/A	Not Applicable	Not applicable and will not be implemented, discussed or assessed at this stage.

3.3 Recommendations

The recommendations are classified according to the specific areas of environmental management and are indicated in Table 5.

Table 5: Types of recommended actions required.

Symbol	Type	Classification	Potential Finding / Action
E	Environmental Management Actions	Identification of actions required to achieve compliance with the management measures stipulated in the EMP and with any other applicable environmental legal requirements.	Actions required for the management of activities relating to the environmental management on site.
M	Monitoring	Identification of monitoring that may be required, reviewing of results, methods, frequency and site selection of the monitoring points.	Changes or actions required pertaining to monitoring being undertaken.
D	Documentation	Compliance with all plans, programs or authorisations required.	Actions are required in order to comply with management measures or legal requirements specifically relating to contents of documentation.
A	Amendment	If any management measures are no longer applicable to the activities being undertaken at the operation, including process changes or impractical requirements.	Require updates and/or amendment to the conditions of the Environmental Authorisation and/or management measures contained in the EMP. May be as a result of activity/process changes on site or in the event that stipulated measures are deemed impractical.

4 ASSUMPTIONS, UNCERTAINTIES AND KNOWLEDGE GAPS

The original prospecting works programme included invasive activities, however these were suspended due to the unsuitability of Glynn Shaft as an access to the underground workings. The COVID pandemic caused delays in the original planned exploration programme and therefore only non-invasive technical studies were undertaken over the last 5 years, with exclusive interest in better understanding the scale and extent of future mining potential in the area.

Progress reports on the prospecting works were completed and submitted annually since 2021, however environmental audit reports were not undertaken. However, as a result of the last progress report the prospecting right holder has identified a need to engage with the public and commence with a public participation programme for the proposed mining area.

Furthermore, the company has completed the necessary background investigations, planning studies and is in a position to commence with small mining applications to affectively stop the current illegal mining activities while future planned prospecting continues, and a renewal of the existing prospecting right must be must be applied for.

5 PUBLIC CONSULTATION

The EIA Regulations require that within 7 days of submission of an environmental audit report to the competent authority, the holder of the environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available to anyone on request; and on a publicly available website, where the holder has such a website. Any comments received will be addressed and copies must be attached herein.

This report was uploaded onto the following website for a period of 7 days: www.envirominprojects.co.za

Furthermore, any comments received during this time must be attached in Section 9.5.

6 EVALUATION AND ASSESSMENT

This audit is an assessment of the ability of the EMPr to adequately provide for effective mitigation of the environmental impacts associated with the undertaking of the activity on an on-going basis and associated with operation of the prospecting right area. The intention of the assessment is to evaluate the compliance with the provisions of the environmental authorisation and the EMPr.

A summary of only the finding of the assessment is provided in Table 7 while Table 8 provides the complete assessment of all management measures.

Table 6: Summary of the findings of the assessment of management measures contained in the EMPr and conditions of the Environmental Authorisation.

Management Measures	Score	Total	Comments
In cases where any contact details of the holder of the EA change including the name of the responsible person, physical/postal address or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA.	10	30	The contact details on the prospecting right and environmental authorisation have changed
If any soil contamination is noted at any phase of the development, the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated. 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.	20	30	No contaminated soil has been identified within the prospecting right area at the time of the prospecting right being granted. However, with known illegal mining activities occurring in the area it is unknown whether any soil contamination has occurred.
In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the National Water Act, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the holder of the EA reads through and understand the legislative requirements pertaining to the development. It is the	20	30	To date no invasive activities have taken place, although this is relevant to the site to ensure that no environmental damage is caused. Site visits have been conducted with the DMRE and illegal mining activities have been acknowledged as problematic.

Management Measures	Score	Total	Comments
responsibility of the holder of EA to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.			
The commissioning and decommissioning of individual activity within the overall listed prospecting activity must take place within the phases and timeframes as set out in the approved EMPr.	20	30	Due to COVID pandemic the Prospecting works Programme activities have been delayed, and timelines are no longer being adhered to. Since non-invasive activities are still being conducted no commissioning / decommissioning is required
A buffer zone of 100 metres between the activity and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.	20	30	Although only non-invasive activities are being conducted, informal residential areas are increasing and has been identified in year 2.
Non-compliance with any condition of this EA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31L of the NEMA.	10	30	No observations have been made that may result in directives, however some non-conformances have been identified.
Monitoring: - Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material. - Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid re-occurrence of complaints. - Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials.	20	30	Since only non-invasive activities have commenced, not all monitoring information may be centralised.

Management Measures	Score	Total	Comments
- Keep copies of all environmental reports submitted to the Department. - Keep the records of all permits, licences and authorisations required by the operation. - Compile a monthly monitoring report and make it available to the Department if requested.			
The holder of EA must submit and Environmental Audit Report to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner. The audit report must specify the following: - Identify and assess any new impacts and risks as a result of undertaking the activity, if applicable; - Identify shortcomings in the EMP, if any; - Identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMP; - If applicable, specify that the corrective action/s taken for the previous audit's non-conformities, were adequate; - Specify the name of the auditor and - Be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit	0	30	The last environmental audit was conducted in November 2021.
The holder of the EA must ensure effective access control to the site to prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.	20	30	No invasive activities are being undertaken and therefore access control is currently not necessary. However, extensive illegal mining is being undertaken in the area and this has been acknowledged as problematic during

Management Measures	Score	Total	Comments
			engagement with the DMRE.
The holder of the EA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and or major accident. The plan must, amongst others, include: - Site Fire - Spillage - Natural disasters such as floods - Industrial action - Contact details of police, ambulances and any emergency centre closer to the site.	10	30	Only non-invasive activities are being undertaken, however this is applicable.
The holder of the EA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.	10	30	This is applicable, although has not been conducted as only non-invasive activities are being undertaken.
Closure objective is to close the re-opened shafts to a state of good repair, an improvement of the current state of the shafts.	20	30	Access via the Glynnis shaft is not considered suitable. No invasive activities have occurred due to delay from COVID pandemic. New closure objective must be set for the PR Renewal.

Environmental Audit Report

Management Measures	Score	Total	Comments
The rehabilitation plan includes closure of the shafts and the closure objective is to seal the re-opened shafts to a state improved from before. Refer to Appendix A.2, the layout map.	20	30	Access via the Glynnis shaft is not considered suitable. No invasive activities have occurred due to delay from COVID pandemic. New closure objective must be set for the PR Renewal.
A Performance Assessment and/or Environmental Audit Report will be conducted annually.	0	30	The last Environmental Audit Report was conducted in 2021.
Total	85%		

Environmental Audit Report

Table 7: Assessment/evaluation of the management measures contained in the EMPr and conditions of the Environmental Authorisation.

Management Measures	Score	Comments	Ref.	Recommendations
CONDITIONS OF THE ENVIRONMENTAL AUTHORISATION: SITE SPECIFIC CONDITIONS				
Should any historical, cultural, paleontological resources and graves be found in the sites, all construction activities must be suspended and South African Heritage Resources Agency (SAHRA) must be contacted immediately. The discoveries must be cordoned off.	n/a	No invasive/construction activities have commenced		
Should there be a construction campsite, it must not be located within 100 metres of a watercourse.	n/a	No invasive/construction activities have commenced		
An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal	n/a	No invasive/construction activities have commenced		
CONDITIONS OF THE ENVIRONMENTAL AUTHORISATION: STANDARD CONDITIONS				
Scope of Authorisation				
1.1 The holder of the EA shall be responsible for ensuring compliance with the conditions contained in the EA. This includes any person acting on the holder's behalf, including but not limited to an agent, servant, contractor, subcontractor, employee, consultant or any person rendering a service to the holder of EA.	30	Compliance is being achieved: ▪ Environmental Performance Audit ▪ Prospecting Fees paid ▪ Progress Reports Submitted		
1.2.... project description as set out in the EA must be approved in writing by this Department before such changes or deviation may be effected. In assessing whether to grant such approval or not, the Department may request such information as it	n/a	This is applicable, although not relevant right now.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
deems necessary to evaluate the significance and impacts of such changes or deviation and it may be necessary for the holder of the EA to apply for further authorisation in terms of the EIA Regulations.				
1.3 The activity, which is authorised herein, may only be carried out at the property indicated in this EA.	30	The following sections have been omitted: - Area south of Turnbridge sections: deemed in accessible due to proximity if surface water pan due to underground workings - Area east of Turnbridge section: deeper section ignored as it is flooded.		
1.4 In cases where any contact details of the holder of the EA change including the name of the responsible person, physical/postal address or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA.	10	The contact details on the prospecting right and environmental authorisation have changed	D1	Update details with the Department of Mineral, Resources and Energy (DMRE) in writing
1.5 The EA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the undertaking of such activity.	30	Compliance is being achieved with other requirements: - Prospecting Fees paid - Progress Reports Submitted		
1.6 The holder of the EA must ensure that all areas where the authorised activity occurs have controlled access to ensure safety of people and animals.	20	This is applicable, although not relevant right now as only non-invasive activities are being conducted.	E1	Report illegal mining activities to DMRE and record the following: Photographic evidence

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
		It must be noted that illegal mining is occurring extensively in the area and has resulted in the area being unsafe, although the PR holder can not be liable for these activities.		- Site visit with DMRE - Attendance register of site visit - Meeting minutes / summary of outcome - Document informal residential areas to authorities
Appeal of Authorisation				
2.1 The holder of the EA must, in writing, within 14 (fourteen) calendar days of the date of this decision and in accordance with Regulation 4(2) of the EIA Regulations.	30	As the EAP managing the application, it is confirmed that notification was undertaken within 14 days.		
2.2 Notify all registered I&APs of- 2.2.1 The outcome of the application; 2.2.2 The date of the decision; 2.2.3 The date of issue of the decision and; 2.2.4 The reasons for the decision as included in Annexure 1 and Annexure 2 (Departmental Standard Conditions)	30	As the EAP managing the application, it is confirmed that this information was provided to the IA&Ps.		
2.3 Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014.	30	As the EAP managing the application, it is confirmed that appeals could be lodged, although none was received.		
2.4 Draw the attention of all registered I&APs to the manner in which they may access the decision	30	As the EAP managing the application, it is confirmed that this information was provided to the IA&Ps.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
2.5 Provide the registered I&APs with the: 2.5.1 Name of the holder (entity) of this EA; 2.5.2 Name of the responsible person for this EA; 2.5.3 Postal address of the holder; 2.5.4 Telephonic and fax details of the holder; and 2.5.5 E-mail address of the holder if any.	30	As the EAP managing the application, it is confirmed that this information was provided to the IA&P		
Commencement of the Activity				
3.1 In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	n/a	This is applicable, although not relevant right now as only non-invasive activities are being conducted.		
3.2 This EA must be provided to the site operator and the requirements thereof must be made fully known to him or her.	30	Although only non-invasive activities are being undertaken, the personnel conducting/authorising non-invasive studies are aware of the contents of the EA.		
3.3 Hauling routes for construction vehicles and machinery must be clearly marked and appropriate signalling must be posted to that effect. Furthermore, movement of construction vehicles and machinery must be restricted to areas outside of the drainage line or wet areas.	n/a	No construction vehicles have been commissioned at this stage. Only non-invasive activities are being undertaken.		
3.4 Appropriate notification sign(s) 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	No construction site has been established at this stage. Only non-invasive activities are being undertaken.		
3.5 Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede	n/a	No construction activities are being undertaken at this stage. Only non-invasive		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
natural surface and subsurface water flow, and drainage measures must promote the dissipation of storm water runoff.		activities are being undertaken.		
3.6 Vegetation clearance must be limited to areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.	n/a	No construction activities are being undertaken at this stage. Only non-invasive activities are being undertaken.		
3.7 xxxxx ⁵ 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	No construction activities are being undertaken at this stage. Only non-invasive activities are being undertaken.		
3.8 If any soil contamination is noted at any phase of the development, the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated. 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.	20	No contaminated soil has been identified within the prospecting right area at the time of the prospecting right being granted. However, with known illegal mining activities occurring in the area it is unknown whether any soil contamination has occurred.	E1	
3.9 In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the National Water Act, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore	20	To date no invasive activities have taken place, although this is relevant to the site to ensure that no	E1	

⁵ Text missing from Environmental Authorisation due the way it was faxed

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
imperative that the holder of the EA reads through and understand the legislative requirements pertaining to the development. It is the responsibility of the holder of EA to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.		environmental damage is caused. Site visits have been conducted with the DMRE and illegal mining activities have been acknowledged as problematic.		
3.10 Construction vehicles must be serviced and maintained in the manner whereby no excessive smokes are released, noise production is reduced to acceptable levels, and oil leaks are prevented. Contaminated soil must be remediated on site or removed to an authorised landfill site.	n/a	No construction vehicles have been deployed at this stage.		
3.11 Residents (if any) on the property and surrounding areas must be informed if any unusually noisy activities are planned.	n/a	No noisy activities are being undertaken at this stage.		
3.12 Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust.	n/a	No activity is being undertaken at this stage.		
3.13 Mixing of cement, concrete, paints, solvent, sealants and adhesive, if done on site, must be done in specified areas on concrete aprons or on protected plastic linings to contain spillage or overflow onto soil to avoid contamination of underground water and environmental damage.	n/a	No mixing of this kind is being undertaken during this stage.		
3.14 Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.	n/a	No material shall be excavated during prospecting, only drilling activities as indicated in the		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
		Prospecting Works Programme. It must be noted that the Prospecting Programme has been delayed due to the COVID pandemic and planned drilling activities are proposed as part of the renewal PR application.		
3.15 Hydraulic fluids or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur, it must be cleared up by removing the spillage together with the polluted solids and dispose it in an authorised disposal site permitted for such waste.	n/a	No storage of hydraulic fluids or chemicals is being undertaken.		
3.16 Chemical sanitation facilities or system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorised waste water treatment works.	n/a	No chemical sanitation facilities/systems are currently being used. Only non-invasive activities are being undertaken.		
3.17 The holder of the EA must ensure that any water uses listed in terms of section 21 of National Water Act, 1998 (Act 36 of 1998) must get authorization	30	Although no water uses are required during prospecting, this remains applicable.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
from the Department of Water and Sanitation prior to the commencement of such activities.				
3.18 This EA does not purport to absolve the holder of the EA from his or her common law obligations towards the owner of the surface of land affected.	30	This is duly noted and no non-compliance in this regard has occurred to date.		
3.19 The holder of the EA must ensure that rehabilitation of the disturbed areas caused by the development at all times comply with the approved EMPr.	n/a	No development has yet occurred on site.		
3.20 This EA may be amended or withdrawn at any stage for non-compliance and provides no relief from the provisions of any other relevant statutory or contractual obligations.	30	No amendments to the EA have been made to date.		
3.21 The holder of the EA must note that in terms section 20 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), no person may commence, undertake or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of section 19(3) for that activity or a waste management licence is issued in respect of that activity if licence is required.	30	No requirements for a waste licence has been identified to date, although this is still relevant.		
3.22 Should you be notified by the Minister of a suspension of the authorisation pending appeal procedure, you may not commence or continue with the activity until such time that the Minister, in writing, allows you to commence or continue with such activity.	30	This EA has not been suspended to date.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
3.23 [Text missing from scanned copy] notification at any reasonable time and at such frequency as may be determined by the Regional Manager.	n/a	This commitment can not be audited at this time.		
3.24 The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming into contact with the waste and must be diverted away from the storage site.	n/a	No hydrocarbons are being stored on site. Only non-invasive activities are being undertaken.		
3.25 Subject to the commencement and duration requirements of the MPRDA and NEMA, the listed prospecting activity is valid for the period for which the aforesaid right is issued for provided that this activity commences within 10 years. If the commencement of this activity does not occur within the specified period, the EA lapses and a new application for EA in terms of the NEMA and the EIA Regulations should be made for the activity to be undertaken.	30	The activity has commenced according to the Prospecting Work Programme. However, only non-invasive activities are currently being undertaken.		
3.26 The commissioning and decommissioning of individual activity within the overall listed prospecting activity must take place within the phases and timeframes as set out in the approved EMPr.	20	Due to COVID pandemic the Prospecting works Programme activities have been delayed, and timelines are no longer being adhered to. Since non-invasive activities are still being conducted no commissioning / decommissioning is required.		
3.27 This EA will only be effective on the event that a corresponding right is issued in terms of the	30	This is relevant and a Prospecting Right has been		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
provisions of the MPRDA and the activity specified in this EA may not commence without such a right.		issued in correlation to this Environmental Authorisation.		
3.28 The activity, including site preparation, may not commence within 20 (twenty) calendar days of the date of the notification of the decision being sent to the registered I&APs. In the event that an appeal is lodged with the appeal administrator, the effect of this environmental authorisation is suspended until such time that the appeal is finalised.	30	As the EAP managing the notification, no activities commenced during the appeal period.		
3.29 Should there be any conflicting conditions between this EA and other approval granted by other authorities, it is upon the holder of the EA to bring it to the attention of the Department for resolution.	30	Currently no conflicting conditions have been noted by the holder of the EA.		
Management of the Activity				
4.1 A copy of the EA and EMPr must be kept at the property or on site office where the activity will be undertaken. The EA and EMPr must be produced to any authorised officials of the Department who request to see such documents and must be made available for inspection by any employee or agent of the holder of the EA who works or undertakes work on site.	30	Although no site office has been constructed due to only non-invasive activities being undertaken, the personnel responsible for appointing contractors for the relevant studies are aware of the contents of the EA and EMPr.		
4.2 The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agent and any other people working on the site.	30	Personnel responsible for conducting the relevant studies are aware of the contents of the EA and EMPr.		
4.3 -	n/a	Numbering is incorrect in the conditions of the EA.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
4.4 -	n/a	Numbering is incorrect in the conditions of the EA.		
4.5 A buffer zone of 100 metres between the activity and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.	20	Although only non-invasive activities are being conducted, informal residential areas are increasing and has been identified in year 2.	E1	
4.6 The holder of the EA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards.	30	This is relevant to the EA holder with respect to any activity being undertaken, currently only non-invasive activities are being undertaken.		
4.7 The holder of the EA must ensure that all non-recyclable waste are disposed of at a waste management facility licensed to handle such wastes and all recyclable waste are collected by licensed waste management recyclers for recycling, reuse or treatment.	n/a	No waste is currently being generated/accumulated on site.		
4.8 The holder of the EA must ensure that all liquid wastes, whose emissions to water or land could cause pollution are diverted to sewer, after testing water quality and receiving written approval from the relevant local authority.	n/a	No waste is currently being generated/accumulated on site.		
4.9 Non-compliance with any condition of this EA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31L of the NEMA.	10	No observations have been made that may result in directives, however some non-conformances have been identified.	D2	Rectify any non-conformances according to the recommendations summarised in Section 7.2

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
4.10 Should it be discovered or come to the attention of the Department that the EA has been obtained through fraud, non-disclosure of information or misrepresentation of a material fact, the Department will suspend the EA in terms of the provisions of regulation 38(1) of the EIA Regulations.	30	This is duly noted and considered compliant.		
4.11 This EA only authorises the listed activity specified in Annexure 1 and a new authorisation must be applied for in respect of any new listed activity not specified as part of Annexure 1.	30	This is duly noted and considered compliant.		
4.12 The holder of the EA must ensure that the names and contact details of an ECO is made available to the Regional Manager within 30 days of commencement. The holder of the EA must also ensure that the ECO is always available on site to ensure that the activity complies with the issued EA and approved EMPr at all times.	n/a	Invasive activities have not yet commenced, no ECO is required at this stage.		
4.13 Monitoring: 4.13.1 Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material. 4.13.2 Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid re-occurrence of complaints. 4.13.3 Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials. 4.13.4 Keep copies of all environmental reports submitted to the Department.	20	Since only non-invasive activities have commenced, not all monitoring information may be centralised.	D3	Compile a file containing the required records in order for this to be displayed immediately upon request: ▪ Incident's register ▪ Complaints Register ▪ Audit Reports ▪ Environmental Reports ▪ Authorisations, permits, rights ▪ Monthly Monitoring Reports

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
4.13.5 Keep the records of all permits, licences and authorisations required by the operation. 4.13.6 Compile a monthly monitoring report and make it available to the Department if requested.				
4.14 The duties and responsibilities of the ECO do not exempt the holder of the EA from the legal obligations in terms of the NEMA and NEMWA.	30	This is duly noted and considered compliant.		
4.15 The footprint of the activity must be limited on the areas authorised for the actual construction works and operational activities and all areas outside of the footprint must be regarded as a "no go" areas.	30	This is duly noted and considered compliant.		
4.16 Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilizing action such as gabions or re-vegetation must be implemented to prevent further habitat deterioration.	n/a	No construction activities have commenced at this stage. Only non-invasive activities are being undertaken.		
4.17 The holder of the EA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risk involved. Records of training and verification of competence must be kept by the holder EA.	n/a	No hazardous waste is being generated on site. Only non-invasive activities are being undertaken.		
4.18 In order to prevent nuisance conditions, the holder of the EA must ensure that all storage skips and bins are not overfilled.	n/a	No skips are being utilised on site. Only non-invasive activities are being undertaken.		
[Text Missing in Scanned Document]				

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
5.1 The holder of EA must submit and Environmental Audit Report to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner. The audit report must specify the following: 5.1.1 Identify and assess any new impacts and risks as a result of undertaking the activity, if applicable; 5.1.2. Identify shortcomings in the EMP, if any; 5.1.2 Identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMP; 5.1.3 If applicable, specify that the corrective action/s taken for the previous audit's non-conformities, were adequate; 5.1 .4 Specify the name of the auditor and 5.1.5 Be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.	0	The last environmental audit was conducted in November 2021.	D4	Submit an environmental authorisation audit on/before November 2025.
5.2 Should any shortcomings in terms of regulation 34(4) of the EIA Regulations be identified, the holder must submit recommendation to amend the EMP in order to rectify any shortcomings identified with the aforementioned audit report.	30	No shortcomings have currently been identified, although this must be provided in Section 7.2		
5.3 Any complaint received from the I&APs during all phases of the operation must be attended to as soon as possible and addressed to the satisfaction of all concerned parties.	30	No complaints have been received as a result of the prospecting activities, as they are currently non-invasive.		
5.4 The holder of the EA must annually assess the environmental liabilities of the operation by using the master rates in line with the applicable Consumer Price Index (CPI) at the time and address	30	The financial provision has been considered during the annual progress reports.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
the shortfall on the financial provision in terms of section 24P of the NEMA.				
5.5 The holder of the EA must, within 24 hours of incidents occurring, notify the Competent Authority of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.	30	No incident has occurred within this stage.		
5.6 The holder of the EA must, within 14 days, or a shorter period of time, if specified by the Competent Authority from the occurrence or detection of any incident referred to in [text missing cut off in scanned copy] schedule, and resource allocation signed off by top management, to the satisfaction of the Competent Authority of measures taken to - 5.6.1.1 Correct the impact resulting from the incident; 5.6.1.2 Prevent the incident from causing any further impact; and 5.6.1.3 Prevent a recurrence of a similar incident.	30	No incidents have occurred to date.		
5.7 In the event that measures have not been implemented within 21 days of the incident referred to in condition 5.6, or measures which have been implemented are inadequate, this Department may implement the necessary measures at the cost of the holder of the EA.	n/a	Since no incidents have occurred this is currently not applicable.		
Site Security and Access Control				

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
6.1 The holder of the EA must ensure effective access control to the site to prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.	20	No invasive activities are being undertaken and therefore access control is currently not necessary. However, extensive illegal mining is being undertaken in the area and this has been acknowledged as problematic during engagement with the DMRE.	E1	
Emergency Preparedness Plan				
7.1 The holder of the EA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and or major accident. The plan must, amongst others, include: 7.1.1 Site Fire 7.1.3 Spillage 7.1.3 Natural disasters such as floods 7.1.4 Industrial action 7.1.5 Contact details of police, ambulances and any emergency centre closer to the site.	10	Only non-invasive activities are being undertaken, however this is applicable.	D5	Compile an Emergency Preparedness Plan containing the following: - Site fire - Spillage - Natural disasters such as floods - Industrial action - Contact details of police, ambulances and any emergency centre closer to the site
7.2 The holder of the EA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.	10	This is applicable, although has not been conducted as only non-invasive activities are being undertaken.	D5	
Investigations				

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
8.1 If, in the opinion of the Competent Authority, nuisances or health risks may be or is occurring on the site, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem.	30	Although applicable, no nuisance or health risks have been identified pertaining to the prospecting activities.		
8.2 If, in the opinion of the Competent Authority, pollution may be or is occurring, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the water quality variables, at those monitoring points and such frequency as may be specified by the Competent Authority.	30	Although applicable, no pollution has been identified by the DMRE.		
8.3 Investigations carried out in terms of conditions 8.1 and 8.2 above must include the monitoring of the relevant environmental pollution, nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Competent Authority.	n/a	This is not currently applicable, as no issues have been identified by the DMRE.		
8.4 Should the investigation carried out as per conditions 8.1 and 8.2 above reveal any unacceptable levels of pollution, the holder of the EA must submit mitigation measures to the satisfaction of the Competent Authority.	n/a	This is not currently applicable, as no issues have been identified by the DMRE.		
Decommissioning				
9.1 Decommissioning of individual activities must comply with the EIA Regulations.	n/a	Decommissioning activities have not yet commenced.		
Site Closure				
10.1 The holder of EA must apply for a closure certificate in terms of Section 43 of the MPRDA	n/a	Decommissioning activities have not yet commenced.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of development.				
10.2 The application for a closure certificate indicated above must be submitted together with all relevant documents as indicated in Section 43 of MPRDA.	n/a	Decommissioning activities have not yet commenced.		
10.3 The holder of the EA remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of extraneous water, compliance with the conditions of EA and the management and sustainable closure thereof until [text missing cut off in scanned copy] Petroleum Resources Development Act (Act 28 of 2002). Where necessary the Minister may retain certain portion of financial provision for residual, health or environmental impacts that might be known in future.	n/a	Decommissioning activities have not yet commenced.		
10.4 The holder of the EA must only make use of indigenous vegetation for rehabilitation purposes.	n/a	Decommissioning activities have not yet commenced.		
CONDITIONS OF THE ENVIRONMENTAL MANAGEMENT PROGRAMME: IMPACTS				
Reopen Inclined Shaft: no management measures	n/a	No management measure specified.		
Underground Sampling: no management measures	n/a	No management measure specified.		
Underground Drilling: - Adhere to conditions of general authorisation - Maintain a spill kit at the shaft area to utilise when needed	n/a	Underground drilling activities have not commenced.		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
- Water Use General authorisation - Soil Quality Contaminated Land				
Water Use: Volume of water required for prospecting is limited to drilling and is less than 5000L for entire drilling programme.	n/a	Underground drilling activities have not commenced.		
CONDITIONS OF THE ENVIRONMENTAL MANAGEMENT PROGRAMME: FINANCIAL PROVISION				
Closure objective is to close the re-opened shafts to a state of good repair, an improvement of the current state of the shafts.	20	Access via the Glynnis shaft is not considered suitable. No invasive activities have occurred due to delay from COVID pandemic. New closure objective must be set for the PR Renewal.	D4	Renew Prospecting right for a period of 3 years and set new closure objectives.
This information has been provided to the landowners and I&AP's during this comment period 8 September to 7 October 2016.	30	I&APs have been provided with this information.		
The rehabilitation plan includes closure of the shafts and the closure objective is to seal the re-opened shafts to a state improved from before. Refer to Appendix A.2, the layout map.	20	Access via the Glynnis shaft is not considered suitable. No invasive activities have occurred due to delay from COVID pandemic. New closure objective must be set for the PR Renewal.	D7	
The amount of R 78302.00 is required manage and rehabilitate the environment in respect of rehabilitation.	30	Given that developing underground access in the vicinity of Glynn Shaft will no		

Environmental Audit Report

Management Measures	Score	Comments	Ref.	Recommendations
		longer be done, is satisfied that the financial provision remains sufficient.		
The amount, is anticipated to be an operating cost and is provided for as such in the Prospecting Work Programme.	30	Although applicable, only non-invasive activities have been undertaken.		
The financial provision must be reviewed and updated annually.	30	Financial provision has been considered in the annual progress report.		
CONDITIONS OF THE ENVIRONMENTAL MANAGEMENT PROGRAMME: AUDITING				
A Performance Assessment and/or Environmental Audit Report will be conducted annually.	0	The last Environmental Audit Report was conducted in 2021.	D4	
CONDITIONS OF THE ENVIRONMENTAL MANAGEMENT PROGRAMME: ENVIRONMENTAL AWARENESS PLAN				
Toolbox talks will be conducted daily to discuss health, safety and environmental topics prior to working underground.	n/a	No invasive activities are being undertaken.		
Internal site assessments will be conducted weekly to ensure that no pollution incidents are evident.	n/a	No invasive activities are being undertaken.		
Total	85%			

7 RECOMMENDATIONS & ACTIONS

After evaluation of the management measures, a summary of the recommendations has been provided in Table 8. The holder of Prospecting Right is responsible for assigning a responsible person and timeframe for completion of these actions. During the next audit, these will be checked to ensure effective implementation.

7.1 Feedback from Findings of Previous Audit

The following feedback has been provided from the holder of the prospecting right on the findings from audit and documentation assessment:

- ✓ Prospecting fees have been paid
- ✓ Annual progress reports have been compiled
- ✗ Illegal mining activities prevalent throughout prospecting right area

The following documentation was provided:

- Annual progress reports

7.2 Summary of Recommendations of Current Audit

A summary of recommendations is provided in Table 8 from **Enviromin Projects** in order to rectify findings identified from the audit undertaken on 25th August 2025. The prospecting right holder must assign a responsible person and completion date for each recommendation.

Table 8: Recommendations and action plan.

Significance	Ref.	Recommendation	Responsible Person	Completion Date
Documentation				
Low	D1	Provide correct contact details to DMRE: ▪ Email address ▪ Contact number		
Medium	D2	Rectify any non-conformances from findings of audit according to Table 8.		
Low	D3	Compile a file containing the required records in order for this to be displayed immediately upon request: ▪ Incident's register ▪ Complaints Register ▪ Audit Reports ▪ Environmental Reports ▪ Authorisations, permits, rights ▪ Monthly Monitoring Reports		

Environmental Audit Report

Significance	Ref.	Recommendation	Responsible Person	Completion Date
High	D4	Submit an environmental authorisation audit on/before November 2025.		
Low	D5	Compile an Emergency Preparedness Plan containing the following: ▪ Site fire ▪ Spillage ▪ Natural disasters such as floods ▪ Criminal activities (illegal mining), include details on security for site access ▪ Industrial action ▪ Contact details of police, ambulances and any emergency centre closer to the site		
Medium	D6	Renew prospecting right. After the expiry of the five years you may request renewal of the prospecting right for a period of no longer than three years.		
Environmental Management				
High	E1	Report illegal mining activities to DMRE and record the following: ▪ Photographic evidence ▪ Undertake site visit with DMRE ▪ Attendance register of site visit ▪ Meeting minutes / summary of outcome ▪ Document informal residential areas to authorities		
Monitoring				
		None		

8 SITE PHOTOS

No site photos have been provided.

9 APPENDICES

9.1 Declaration of Lead Auditor

I, Candis Lubbe, on behalf of **Enviromin Projects** declare that we are an independent company and that I am an independent Environmental Assessment Practitioner and do not have and will not have any vested interest (either business, financial, personal or other) in the operation other than for fair remuneration for work performed in terms of the legal requirements as specified within the scope of work.

Signature: Candis Lubbe

Designation: Environmental Assessment Practitioner

Date: 12 September 2025

9.2 Acceptance of Performance Assessment by Client

I Sean Meadon, the duly appointed Representative / Director for **K2015073261 (South Africa) (Pty) Ltd** hereby accept the contents of this report undertaken for the purposes of the Environmental Audit, as true and correct, and undertake to implement the recommendations and actions as specified in order to achieve compliance.

Signature:



Designation: Director

Date: 12 September 2026

9.3 Experience & Expertise of Auditor

9.4 Progress Report – Proof of Submission 2023-24

10 November 2024

Ref. No. GP 30/5/1/1/2 (10448) PR

The Council of Geoscience

280 Pretoria Street

Silverton, Pretoria

Attention: Luvhuwani

nlalamani@geoscience.org.za

**Re: Submission of Annual Prospecting Progress Report for K2015073261 (South Africa) Pty Ltd
for YEAR 4 (2023/2024) for Prospecting Permit GP 30/5/1/1/2 (10448) PR**

To whom it may concern,

For your attention, attached hereto, please find the following supporting documents in terms of our annual progress reporting requirements:

1. An Electronic copy of our YEAR 4 (2023/2024) annual prospecting progress report
2. Appendix A – Supplementary documentation described in the report itself

I trust you will find this in order.

Kind regards,



Sean Meadon

Director-K2015073261 (SA) Pty Ltd

Curriculum Vitae: Ms C Lubbe

Name: LUBBE, CANDIS
Date of Birth: 3 October 1983
Profession/Specialisation: Principal EAP and Director
Nationality: South African
Experience: 19 years
Contact: 084 371 0123 | candis@envirominprojects.co.za



KEY EXPERIENCE AND OVERVIEW

Candis Lubbe has nineteen (19) years' working experience as an environmental consultant in the general industry and mining sectors. Key experience includes the overall project lifecycle management of environmental authorisation applications such as Basic Assessments, Environmental Impact Assessments (EIAs), Waste Licences,

Water Use Licence Applications, and Rectification of unlawful activities (Section 24G Applications) including the associated public participation processes. Additional experience comprises the compilation of Mining and Prospecting Right applications, Environmental Management Programmes and Plans, Financial Provision calculations and providing continuous environmental and legal guidance to existing mining operations of various minerals (silica, aggregate, gold, chrome, pyrophyllite and tailings reclamations). Ms. Lubbe also has experience related to the assessment of complex sites, operations and facilities including general environmental management, legal compliance assessments, due diligence, assessment of potential land contamination, environmental performance audits (MPRDA), and auditing of Environmental Authorisations (in terms of WUL and NEMA).

PROFESSIONAL MEMBERSHIP & AFFILIATIONS

- **SACNASP** (Pri. Sci. Nat 1176831): 2017-2026
- **ELA** (Environmental Law Association): 2015-2025
- **IAIA** (Membership No. 6800): 2011-2025
- **EAPASA** (Registration No. 2021/3700): 2021-2026

KEY QUALIFICATIONS

BSC HONOURS (ECOLOGY, ENVIRONMENT AND CONSERVATION)

University of the Witwatersrand (2006), Graduated 5 April 2007

BACHELOR OF SCIENCE (ZOOLOGY)

University of the Witwatersrand (2005), Graduated 6 April 2006

SUPPLEMENTARY TRAINING & WORKSHOPS, CONFERENCES & SEMINARS

- **Energy Efficiency and Sustainability** (2021), University Cape Town Online
- **Renewable Energy Workshop** (2021), IMBEWU Sustainability Legal Specialists
- **COVID-19 Workplace HSE** Webinar, NOSA (2020)
- **Financial Provision Regulations and Mine Closure Requirements** (2016), IMBEWU Sustainability Legal Specialists

- **SA Waste Laws Update Workshop** (2015), Laura Taylor, EnviroSus
- **Basic Principles of Ecological Rehabilitation and Mine Closure** (2014), CEM, North-West University Potchefstroom Campus
- **Contaminated Land Workshop** (2013), IMBEWU Sustainability Legal Specialists
- **Technical & Legal Guidelines for EIAs** (2011), DLA Cliffe Dekker Hofmeyer
- **Introduction to Integrated Waste Management for Environmental Managers** (2011), CEM, North-West University Potchefstroom Campus
- **Cross Cutting & Integrated EIA Training** (2011), IMBEWU Sustainability Legal Specialists
- **Public Participation** (2009), CEM, University of the Free State
- **Project Management for Environmental Impact Assessments** (2009), CEM, University of the Free State
- **Social Impact Assessment** (2009), CEM, University of the Free State
- **Environmental Awareness & Legal Liability for Managers** (2008), Green Gain Consulting.
- **Monitoring of Ecological Success Criteria for Mine Site Closure.** David Tongway, University of Western Australia (held in SA)
- **Environmental Law for Environmental Managers** (2007), CEM, North-West University Potchefstroom Campus
- **Hazardous Waste Classification System Workshop** 13 March 2009 – Department of Environmental Affairs and Tourism, Leriba Lodge, Centurion, Pretoria
- **Mine Water Conference** 24 March 2009 – Environmental Resources Management (ERM), The Saxon Hotel, Sandhurst, Johannesburg
- **Global Warming and the Search for Sustainable, Clean Energy by Patrick Moore** 3 March 2008 – University of Witwatersrand, Braamfontein, Gauteng
- **4th International Conference on Mining and Industrial Waste** 12 -13 March 2008 – Orion Safari Lodge, Rustenburg, Western Cape
- **Workshop for Clean Development Mechanism in South Africa** 26 June 2008 – Designated National Authority – Department of Minerals and Energy, Burgers Park Hotel, Pretoria, Gauteng
- **Dr DeMartini – Mastering the Art of Communication** 2 July 2008 – Monte Casino Conference Centre, Sandton, Gauteng
- **Public Meeting Information Session on Draft Waste Management Bill** 20 March 2007 - Parktonian Hotel, Braamfontein, Gauteng
- **3rd International Mine Closure Conference** 13 -17 October 2008 – Animal, Plant & Environmental Sciences (APES) - University of the Witwatersrand, Centre for Land Rehabilitation, University of Western Australia. Indaba Hotel, Johannesburg

EMPLOYMENT RECORD

Oct 2017 – Current	Enviromin Projects (Pty) Ltd Project Manager & Environmental Assessment Practitioner
Nov 2015 – Sep 2017	PRISM Environmental Management Services Senior Environmental Assessment Practitioner
Aug 2010 – Oct 2015	Umlaba Environmental Consulting CC Environmental Consultant
Jan 2009 – Sep 2007	EcoPartners (Pty) Ltd Junior Environmental Consultant
Oct 2007 – Jun 2009	EnviroServ Waste Management (Pty) Ltd National Junior Project Co-ordinator
Jul 2009 – Jul 2010	EcoPartners (Pty) Ltd Environmental Scientist

PROJECT EXPERIENCE

Sustainable Development Documentation Update:

- Siyanda Bakgatla Platinum Mine: Review, update and compile all MCOPS, Procedures and Policies for all Departments, Mining, Engineering, Health and Safety, Environment, Human Resources, Finance, Human Resources, Housing onto new SharePoint System, Contract 2020-2022.

Environmental Authorisation Process (BA, EIA, WL, WULA):

- Harmony Gold: Saaiplaas BA and AEL for Installation of Kiln, 2023; Sibanye Stillwater: Waste and EIA Application, 2023; Happy Island: EIA and WULA for development of a Water Park, 2016; Macsteel Tube & Pipe: Lillianton: Basic Assessment for Decommissioning of Galvanising Plant, 2016; Sand Shifters: Nietgedacht EIA, Waste Licence and WULA for storage, handling and distribution of building waste, 2016; Northam Platinum Limited: Basic Assessment for AEL Amendment for Smelter Expansion, 2016; Goedeberg: WULA for Bulk Sewer Line Installation, 2016; Gold One: Modder East: EIA and Waste Licence, 2015; HALO Aviation: Basic Assessment for Heliport, 2012; AfriSam: Jukskei: Basic Assessment for Construction of Infrastructure within a Watercourse, 2011; Gold Fields: Public Participation Process and Socio-Economic Study for EIA, 2009; Gold Fields: EIA for Mega Tailings Storage Facility (team project), 2009; Savcio Holdings: LH Marthinusen: Basic Assessment Process, 2009; Modikwa Platinum: Basic Assessment (not completed), 2009; Savcio Holdings: LH Marthinusen: Basic Assessment for treatment of used oil, 2008; Spray Pave: Basic Assessment for storage for dangerous goods (not completed), 2008; Oil Separation Solutions: Waste Permit: Assisted with compilation of Section 20 of ECA, 2007; Old Oil Man: Waste Permit: Assisted with compilation Section 20 of ECA, 2007.

Section 24G Applications:

- Holy Land Development: Section 24G Review and Submission, 2024; Cyclops Engineering: Section 24G Public Participation and Appeal, 2023-2024; Assore: Rustenburg Mineral Development Company: Groenfontein: Section 24G Application, 2014; Assore: Rustenburg Mineral Development Company: Zandspruit: Section 24G Application, 2014; Assore: Wonderstone Limited: Section 24G Application, 2014; Assore: Zeerust Chrome Mines Limited: Section 24G Application, 2014; Rubble Tech: London Road: Section 24G Application, 2013; JPL Sawmills: Section 24G Application, 2011; Spray Pave: Section 24G Application, 2008.

Mining/Prospecting Applications, EMPLans and Amendments:

- **Mining Permit / Prospecting Right Applications:**
 - Jukskei Sand Project CC: Section 106 Notification, 2011; Masoke Investments: Prospecting Right Basic Assessment Amendment, 2021; Benoni South: Prospecting Right Application & Basic Assessment, 2016; Bundu Sand: Mining Permit Application and EMPlan, 2014; Heidelberg Clay & Brick Sand: Mining Permit Application, 2014; Infrasons: Marble Hall: Mining Right Application (not completed), 2013; BSC Resources: KZN5: EMPlan Amendment, 2012; Gold One: Ventersburg 6: EMPlan & Amendment, 2012; Jukskei Sand Project CC: Mining Permit Application, 2012; Uitzicht Sands: EMPlan, 2011; Whitewater Westward Exploration: EMPlans for C1, C2A and C3, 2010; Goliath Gold Mining Limited: Blinkpoort: EMPlan Amendment, 2012.
- **Financial Provisions:**
 - Janho Quarry: Financial Provisions, 2016; Goliath Gold Mining Limited: Nigel: Financial Provision, 2011; Goliath: Sub-Nigel: Financial Provision, 2012; Group Five: Laezonia: Financial Provision, 2012; Raumix: Rosslyn: Financial Provision, 2012.
- **Renewals:**
 - AfriSam: Saldanah: Prospecting Right Renewal, 2011; BSC Resources: Prospecting Right Renewal Environmental Report, 2011; Gold One: Wit Nigel: Right Renewal: Environmental Report, 2011; Uitzicht Sand: Mining Permit Renewal, 2014; Gold One: Ventersburg 3&4: Prospecting Right Renewal, 2013.
- **Closure Applications:**
 - Group Five: Panfontein: Closure Application (PR), 2013; Tradmil Trading 10 (Pty): Vischgat: Closure Application MP & PR, 2013.

EIA/EMP Amendments (Section 102 MPRDA):

- Drift Supersand: EMP Amendment, 2015; Group Five: Zimbiwa Resources: EMP Amendment, 2012; AfriSam: Zeekoewater: EMP Amendment, 2011; Gold One Limited: Ventersburg: Natural Gas Exploration EMP Amendment, 2011; Raumix: Aliwal: EMP Amendment (assist), 2011; Raumix: Queenstown: EMP Amendment (assist), 2011; Gold One Limited: Ventersburg: Natural Gas Exploration EMP, 2010; Gold Fields: Driefontein: EMP Amendment, 2010.

Environmental Performance Assessment Audits (Regulation 55 MPRDA):

- Benoni South: Environmental Performance Audit 2021; Janho Quarry: Environmental Performance Audit (MR), 2016; AfriSam: Rheeboek: Environmental Performance Audit (MR), 2015; Bundu Mining: Environmental Performance Audit (MR), 2015; Drift Supersand: Environmental Performance Audit (MR), 2015; PPC: Dwaalboom: Environmental Performance Audit (MR), 2015; Raumix: Willows: Environmental Performance Audit (MR), 2015; Group Five: Sky Sands: Environmental Performance Audit (MP), 2014; AfriSam: Eikenhof: Environmental Performance Audit (MR), 2013; AfriSam: Olifantsfontein: Environmental Performance Audit (MR), 2013; PPC: Dwaalboom: Environmental Performance Audit (MR), 2013; Raumix: Rossway: Environmental Performance Audit (MR), 2013; AfriSam: Roodekrans: Environmental Performance Audit (MR), 2012; AfriSam: Ulco Cement: Environmental Performance Audit (MR), 2012; Goliath: New Kleinfontein - Modder East: Environmental Performance Audit (MR), 2012; Goliath: Sub-Nigel: Environmental Performance Audit (MR) & Financial Provision, 2012; Gomes Sands: Bundu Sands: Environmental Performance Audit (MP), 2012; Gomes Sands: Doornrandjie: Environmental Performance Audit (MP), 2012; Group Five: Laezonia: Environmental Performance Audit (MP) & Financial Provision, 2012; New Kleinfontein: Modder East: Environmental Performance Audit (MR), 2012; Raumix: Petra Quarry: Environmental Performance Audit (MR), 2012; AfriSam: Rooikraal: Environmental Performance Audit (MR), 2011; Group Five: Sky Quarries (Tradmil Trading): Environmental Performance Audit (MP), 2011; Raumix: Rosslyn: Environmental Performance Audit (MR), 2011; AfriSam: Jukskei: Environmental Performance Audit (MR), 2010; Gold One Limited: Sub-Nigel: Environmental Performance Audit (MR), 2010.

Audits (Legal, RoD Compliance / Internal):

- AfriSam: Zeekoewater: Water Use Licence Audit, 2023; Gold One: Modder East: Water Use Licence Audit, 2015; PPC: Dwaalboom: Environmental Audit (RoD), 2015; Assore: Environmental Component of the EHS Legal Compliance Audit, 2014; Dawn Sanitaryware: Legal Compliance Report for Vaal Sanitaryware and Libra Bathrooms, 2010; Vaal Sanitaryware: Site Assessment – Manufacturing Process & Waste Streams, 2010; Gold One Limited: Modder East: Internal Audit, 2010; Basil Read: Legal compliance audit (team project), 2008; Oil Separation Solutions: Legal compliance audit (team project), 2008; NORA-SA: Audit reports for used oil collectors, 2007; Oil Separation Solutions: Evaluation of Minimum Requirements of ROD Waste Permit, 2007.

Other:

- Wings for Life World Run: Event Waste Management Plan, 2023; Run Zone: Event Waste Management Plan: aQuelle Ultra, 2023; Run Zone: Event Waste Management Plan: Joburg North City, 2023; Run Zone: Event Waste Management Plan: Twenty-One Ten, 2022; Randburg Harriers: Event Waste Management Plan: Discovery Vitality Series: Randburg Harriers Challenge, 2022; Randburg Harriers: Event Waste Management Plan: Valentines Nite Race, 2022; Run Zone: Event Waste Management Plan: Icebreaker, 2019; Run Zone: Event Waste Management Plan: Joburg North City Marathon, 2019; Assore: Wonderstone Limited: Waste Classification, 2015; JPL Sawmills: Directive, 2014; Group Five: Laezonia: Due Diligence, 2013; PPC: Best Practice Procedure: Waste Management & I&AP Consultation, 2013; AfriMat: Inferon: Due Diligence, 2012; Gold One: Ventersburg: BFS Specialist Studies Review (Socio-Economic, Noise and Traffic); Pronto: Ulula Ash: Environmental Management Plan, 2012; Eskom: Matimba: Review of SHEQ Impact Register (project team), 2010; Eskom: Matimba: Training Material: Environmental Awareness and Legal Compliance, 2010; EnviroServ: Training Material: Legal Compliance & Environmental Awareness, 2009; Basil Read: SHEQ Legal Register, 2008; NORA-SA: Operations Manual for Used Oil Collectors, 2007; Basil Read: Operations and Maintenance Manual

for Modimolle Water Tower, 2007; Oil Separation Solutions: Operational Procedures: Integrated Management System ISO 14001, ISO 9001 and HSAS 18001, 2007; Oil Separation Solutions: SHEQ Legal Register, 2007.

PERSONAL DETAILS

Drivers: Code 08

Vehicle: VW Caddy

Marriage Status: Single

Dependents: None

Language: English

Hobbies: Running and Yoga

REFERENCES

- **Andrew Nicholson**

Managing Director: Umhlaba
084 840 6316

- **Lynn Whittington Jones**

Managing Director: Umhlaba
084 626 1704

- **Charlaine Baartjes**

Managing Director: EcoPartners
084 515 5840

- **Graham Block**

Run Zone Events
072 276 9635

9.5 Comments Received

No comments received to date.