



KHWEZELA BOKGONI COLLIERY

Environmental Audit Report

Submitted as contemplated in section 24N (7) (d) of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) and Regulation 34 under Part 3 of Chapter 5 of the amended Environmental Impact Assessment Regulations, 2014 (Government Notice No. 982) (EIA Regulations, 2014)

DMRE Reference No's:

**MP 30/5/1/2/2/307 MR; MP 30/5/1/1/3/2/2 307 EA; MP 30/5/1/2/3/2/1 307 EM;
MP 30/5/1/3/2/1 1666 MP; MP 30/5/1/1/3/2/2 307 EA; MP 30/5/1/2/3/2/1 307 EM;
MP 30/5/1/3/3/2/1 11666 EM**

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Geovicon Environmental (Pty) Limited
(Environmental & Geological Consultants)
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As of 7 June 2021, following the completion of the demerger of high-quality export thermal coal operations from Anglo American, Thungela has successfully listed on the Johannesburg and London stock exchanges. As such, we will now legally change our name from Anglo Operations Proprietary Limited ("AOPL") to Thungela Operations Proprietary Limited ("TOPL"). Thungela offers investors access to a high-quality thermal coal business with low cash cost and high-margin assets, as well as a strong balance sheet, underpinned by a robust environmental, social and governance ("ESG") framework. Thungela owns interests in and produces thermal coal predominantly from six collieries located in Mpumalanga, South Africa. The business address has changed to **25 Bath Avenue; Rosebank; 2196; South Africa** however, the specific mines addresses remain unchanged. It is important to note that the legal name change from Anglo Operations (Pty) Ltd to Thungela Resources (Pty) Limited will officially be effective early 2022.

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1. INTRODUCTION

Anglo Operations (Pty) Ltd.'s Kleinkopje Colliery and Landau Colliery merged in December 2016 to form the Khwezela Colliery. The merger was necessary due to the close proximity of the two mines, their respective remaining life of mine, working relationship and the fact that it became economically unviable to operate the operations as separate entities.

It is however important to note that the Khwezela Bokgoni Colliery ("**KBC**") section and the Khwezela Colliery North Section are currently still operating under their approved Environmental Management Programme Reports ("**EMPrs**"), Water Use Licences ("**WULs**") and Environmental Authorisations ("**EAs**").

KBC is an existing opencast coal mine situated in close proximity to the town of eMalahleni in the Mpumalanga Province of South Africa. The mine boundary area of KBC has an approximate size of 4000 ha and approximately 7.6 million Run of Mine tons of coal is extracted from the opencast pits annually. Mining in the vicinity of KBC commenced more than 100 years ago, with underground mining commencing in 1901 and ceased in 1991. Mini-pits were mined at KBC from 1976 to 1979 with large scale opencast mining commencing 1979. In recent years, mining activity versus financial costs involved has been less viable and has resulted in KBC mining operations ceasing in the first quarter of 2021 to move into care & maintenance of the mine. A number of the sections that were being mined, were mined through underground bord-and-pillar workings that are economically exploited through the utilisation opencast dragline mining techniques.

The Mpumalanga Province Regional Manager of the Department of Mineral Resources and Energy was advised by letter dated 6 November 2020 of Anglo's intention to move the KBC into care and maintenance.

Anglo is aware and committed to continued fulfilment of its environmental management obligations in terms of its approved EAs and EMPr, and at this point in time, do not envisage amending any condition of the EAs or EMPrs as a result of moving KBC into care and maintenance.

Anglo Operations (Pty) Ltd appointed Geovicon Environmental (Pty) Limited to assess the compliance of KBC mining operation against conditions/commitments of its applicable EAs and EMPrs issued and approved in terms of the National Environmental Management Act, 1998 ("**NEMA**") and the Mineral and Petroleum Resources Development Act, 2002 ("**MPRDA**"). This report was compiled after completion of both virtual and physical, on-site information and evidence gathering in order to verify whether the mine complies to the applicable compliance obligations and is hereby submitted for public review.

2. LEGAL FRAMEWORK

2.1 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998) (NEMA)

Regulation 34 of the EIA Regulations, 2014 states that the holder of an environmental authorisation must, for the period during which the EA and EMPr remain valid, ensure that compliance with the conditions of the EA and the EMPr is audited and that an environmental audit report, prepared by an independent person, is submitted to the relevant competent authority, which in the case of Khwezela Colliery is the Department of Mineral Resources and Energy, Mpumalanga Regional Office. The above-mentioned environmental audit report must determine the ability of the EAs and EMPrs to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the mining operation on an ongoing basis and the level of compliance with the provisions of EAs and the EMPrs.

With the amendment of the EIA Regulations, 2014, on 7 April 2014, Regulation 54A was introduced. Regulation 54A (2) of the EIA Regulations, 2014 which has also been amended, further states that: *“Where a right or permit issued in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) for –*

(a) prospecting or exploration of a mineral or petroleum resource; or

(b) extraction and primary processing of a mineral or petroleum resource;

and the associated Environmental Management Programme or Environmental Management Plan approved in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) is still in effect after 8 December 2014, the requirements contained in Part 3 of Chapter 5 of these Regulations apply to such Environmental Management Programmes or Environmental Management Plans and the first environmental audit report must be submitted to the competent authority by a date to be published by Notice in the Government Gazette”.

3. SCOPE AND PURPOSE OF THE ENVIRONMENTAL AUDIT

The purpose of this audit was to verify whether Khwezela Bokgoni Colliery complies with the requirements outlined in the various EAs and applicable EMPrs:

EAs:

- EA for Pit 2A Extension Project, ref: MP 30/5/1/1/3/2/2 307 EA, approved 27 September 2017
- EA for Landau III Mine Residue Depot, ref: MP 30/5/1/2/3/2/1 307 EM, dated 28 March 2018

- EA for Landau III Mine Residue Deposit Borrow Pit, ref: MP 30/5/1/3/3/2/1 11666 EM, dated 10 July 2018

EMPrs:

- Kleinkopje Colliery Revised and Consolidated EIA and EMP, ref: MP 30/5/1/2/2/307 MR, dated April 2012
- Kleinkopje Colliery Pit 2A Extension EIAR and EMP, ref: MP 30/5/1/1/3/2/2 307 EA, dated September 2017
- Reclamation of the Landau 3 Mineral Residue Deposit: Environmental Impact Assessment Report and Environmental Management Programme Report, ref: MP 30/5/1/2/3/2/1/ 307 EM, dated December 2017
- Bokgoni borrow pit, ref: MP 30/5/1/3/2/11666MP, dated March 2018

The environmental audit was conducted to determine the level of performance against compliance of the mining operation with the provisions of the issued EAs and approved EMPs. The audit was conducted to further determine the ability of the measures contained in the EAs and EMPs to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with Khwezela Bokgoni Colliery's mining operations and associated surface infrastructure and activities.

In view of the above, the scope of this compliance assessment is as follows:

- To report on the compliance of the mine with the conditions, commitments and/or mitigation measures in the EMPs and EAs and the extent to which the avoidance, management and mitigation measures provided for in the EMPs and EAs and achieve the objectives and outcomes of the EAs and EMPs;
- To identify and assess any new impacts and risks arising from the Khwezela Bokgoni Colliery mining activities;
- To evaluate the effectiveness of the EMPs and EAs;
- To identify any inadequacies in the EMPs and EAs; and
- To identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPs and EAs.

4. METHODOLOGY ADOPTED IN PREPARING THE ENVIRONMENTAL AUDIT REPORT AND DECLARATION OF INDEPENDENCE

4.1 AUDIT TEAM

Auditor: Mr. Ryan Nawn

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Experience of the Auditor

Ryan Nawn holds a M.Sc. degree in Environmental Management from the then Rand Afrikaans University (presently University of Johannesburg). He has twenty (20) years' working experience in environmental management. He is vastly experienced in the implementation, maintenance and auditing of Environmental Management Systems (EMS) and has conducted a wide range of environmental audits ranging from company internal audits, environmental authorisation audits, water use license audits, waste license audits and EMS surveillance and certification audits. Ryan is a registered ISO 14001 EMS Lead Auditor with the Southern African Auditor & Training Certification Authority (SAATCA) – one of only limited few in South Africa who is both an Environmental Assessment Practitioner and EMS Auditor. He also facilitates training courses in ISO 14001 – ranging from implementation, transition, and lead auditor courses on behalf of various certification bodies and training institutions.

Ryan has been involved in developing Environmental Management Plans for the green building industry and subsequent audits thereof. Significant experience has been gained in environmental compliance monitoring by working on large linear construction projects such as the Vaal River Eastern Sub-system Augmentation Project (VRESAP); the Olifants River Water Augmentation Project – Phase 2; as well as the Mokolo-Crocodile Water Augmentation Project – Phase 1 (MCWAP) in Lephalale. Relevant experience has also been gained in integrated environmental management processes such as

Environmental Impact Assessments (EIAs) and Basic Assessment processes and Reports (BARs), and the development of EMPs. Mr Nawn has also been actively involved in public participation and community development processes. He has research experience in water quality and catchment management.

Mr. Ryan Nawn contracted in by Geovicon Environmental (Pty) Limited, hereby declares that he is an independent auditor and that Geovicon Environmental (Pty) Limited and himself have no business, financial, personal or other interest in this project in respect of which Geovicon Environmental (Pty) Limited is appointed. Furthermore, no circumstances exist that may compromise the objectivity of Geovicon Environmental (Pty) Limited, excluding fair remuneration for work performed in connection with this environmental audit.

4.2 FREQUENCY OF REPORTING

Khwezela Bokgoni Colliery is operated under the above-mentioned EMPs and EAs approved in terms of NEMA. In terms of regulation 34(2)(d) of the NEMA EIA Regulations “the environmental audit report contemplated in sub-regulation (1) must be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation”. The NEMA environmental authorisations did not indicate the auditing frequency. In view of the above and since the authorisations did not comply with the requirements of regulation 26 (e) of the NEMA EIA Regulations which requires an environmental authorisation to specify the frequency of auditing of compliance with the conditions of the environmental authorisation and compliance with the approved EMPs, the auditing interval is annually.

4.3 PERIOD THAT APPLIES TO THIS COMPLIANCE ASSESSMENT

The audit review period for this environmental audit report is January 2020 to April 2021.

4.4 PROCEDURE USED DURING THE EXTERNAL AUDIT

The following was used as a procedure for the compliance assessment:

- Desktop assessment of the approved KBC EMPs and NEMA EAs. The desktop assessment was used to list all commitments and conditions indicated in the EMPs and NEMA EAs. Also, as part of the desktop assessment, Geovicon’s previous Reg 34 audit report was referred to in order to establish the “direction of travel” where possible (i.e. has the mine progressed or regressed in its compliance status).
- The Environmental Audit was conducted by reviewing and abstracting the commitments (management and mitigation measures) from the approved EMPs and conditions from the approved EAs. In cases where the commitments had not yet been fulfilled, either because the applicable phase is not reached or some other reason, such has been indicated in this report. As

described further below, the auditor also had extensive interviews with the relevant KBC personnel. These interviews were held over a period of five days.

- Site visits were conducted on 15 & 16 April 2021 and was used to assess the compliance with the conditions and commitments of the EAs and EMPs. The site visits were used to determine effectiveness of measures implemented to mitigate potentially negative environmental impacts, and measures to enhance positive impacts, which determined compliance of the operation with the conditions and commitments in the EAs and EMPs. The use of site visits therefore allows the auditors to collect evidence thereby enabling them to verify whether the organisation complies to the audit criteria, viz. the relevant conditions of the EAs and EMPs.

4.5 EVALUATION CRITERIA USED DURING THE COMPLIANCE ASSESSMENT

Evaluation criteria used during the compliance assessment include the following:

- Are the measures and structures as indicated in the EMPs and EAs in place?
- Are the measures adequate and structures maintained, and at what frequency?
- Has the monitoring as indicated in the EMPs and EAs been conducted? (Data, reports).
- Is the reported frequency of the monitoring in accordance with the EMPs and EAs? (Reports)
- Determining whether any new measures are required to prevent or mitigate the existing environmental impacts and/or other potential impacts.

Evaluation of the appropriateness and adequacy of the EMPs and EAs included the following:

- Compliance with relevant laws pertaining to the environment.
- Compliance of mining and associated activities with the EMPs and EAs. (Is the mine conducting activities that are not provided for in the EMPs and the EAs?)

4.6 RATING OF FINDINGS

The compliance category was rated as indicated in the table below.

Table 1: Compliance Categories

Compliance category	Findings
Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document.	Compliant
The operation failed to comply with, or satisfy the requirements of an applicable condition, commitment and/or mitigation measure. Non-compliances include instance, where although the current condition or mitigation measure has been achieved, there have been new impacts and risks arising from the activity; whether the current measures are effective and whether there are any shortcomings which need to be address through changes in the systems or amendment of the EA or EMPr.	Non-Compliant
The condition, commitment and/or mitigation measure is not applicable. A “Not Applicable” finding is also noted in events where such condition, commitment and/or mitigation measure is either obsolete, alternative effective measure is utilised or commitment and/or mitigation measure is not yet relevant but remains relevant for future activities.	Not Applicable
The condition, commitment and/or mitigation measure that does not require any specific action.	Noted

5. ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

Although all reasonable attempts were made to verify comments made during interviews held with relevant KBC personnel as well as the review of documentation, it is assumed that such comments and documents provided are a true and accurate reflection of the audit.

In an event where insufficient information was provided to support the verification of compliance status, the auditors' general approach was to indicate that such commitments/conditions could not be verified, and as such, the findings were noted as non-compliant.

6. EMPR RECOMMENDATION REPORT

Regulation 34(4) of the EIA regulation, 2014 state the following:

Where findings of the Environmental Audit Report indicate:

- insufficient mitigation of environmental impacts associated with the undertaking of activity;
- insufficient levels of compliance with the Environmental Authorisation or EMPr and where applicable the closure plan;

the holder must when submitting the environmental audit report to the competent authority in terms of sub regulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify shortcomings identified in the environmental audit report and such recommendations must have been subjected to a public participation process as agreed to by the competent authority.

Despite the identified non-compliances, recommendations were not made toward any amendment of the EMPr's. The mine must develop action plans for the correction of the identified non-compliances.

7. RESULTS OF THE EXTERNAL AUTHORISATIONS AND EMPR AUDIT


The results of the EIA Regulation 34 Environmental Audit are provided in the Tables below. The tables outline the EAs and EMPRs for each of the authorised activities at KBC.

7.1 ENVIRONMENTAL IMPACT AND MANAGEMENT PROGRAMME, APPROVED 2012

7.1.1 Environmental Management Programme – Management measures for the Operational Phase

Condition number	Condition	Finding	Observation/ Audit Evidence
1. Section: Benicon Engineering			
1.1	The Key Performance Indicators (KPI) for 2010-2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. In order to ensure better fuel efficiency, vehicles are maintained on a regular basis. To prevent unnecessary fuel wastage, vehicles are not left to idle when not in use.	Not Applicable	Benicon is no longer a contractor at Khwezela Bokgoni Colliery (KBC) and their site has been demobilised since 2011. Therefore, commitment to this condition of the EMPr is no longer applicable.
1.2	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines.	Not Applicable	Benicon is no longer a contractor at Khwezela Bokgoni Colliery (KBC) and their site has been demobilised since 2011. Therefore, commitment to this condition of the EMPr is no longer applicable.
1.3	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface and groundwater resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Not Applicable	Benicon is no longer a contractor at Khwezela Bokgoni Colliery (KBC) and their site has been demobilised since 2011. Therefore, commitment to this condition of the EMPr is no longer applicable.
1.4	To minimise the visual impact from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Not Applicable	Benicon is no longer a contractor at Khwezela Bokgoni Colliery (KBC) and their site has been demobilised since 2011. Therefore, commitment to this condition of the EMPr is no longer applicable.
1.5	To minimise the impact of hazardous waste on the water and soil, KK employees and visitors adhere to the waste management and waste separation procedures as well as the spillage clean-up procedures. All hazardous waste is disposed of in red	Not Applicable	Benicon is no longer a contractor at Khwezela Bokgoni Colliery (KBC) and their site has been demobilised since 2011. Therefore, commitment to this condition of the EMPr is no longer applicable.

Condition number	Condition	Finding	Observation/ Audit Evidence
	waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		
2. Draglines & RH Shovels			
2.1	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
2.2	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	A SAP system is used at KBC, for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. The schedule on this system includes the following information: <ul style="list-style-type: none"> • Date of Service • Plant / equipment type • Plant / equipment no. • Service Type • Last Service (in hours) • Date the service was completed
2.3	Gas monitors are installed in the workshop to detect gas levels. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Gas monitors are not installed at all the workshops but on specific machines instead. Handheld gas monitors are also present within the various workshops. Gas monitoring is undertaken at various sections of the mine by the 'Ventilation Occupational Health & Engineering' (VOHE) officer and reports are recorded. Signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section. 'Visibly Felt Leadership' campaigns are also held every Tuesday at all active workshops. All staff undergo pre-medical examinations and post-medical examinations upon leaving the mine.
2.4	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, the workshop is fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	On site observations confirmed that signage is present throughout the mine indicating the minimum PPE required to undertake activities within each specific area. It was also observed that new PPE signages were on display around the mine's plant and workshop areas – despite the mine having moved into Care & Maintenance phase in 2021.

Condition number	Condition	Finding	Observation/ Audit Evidence
			 <p>An example of PPE requirements signages seen displayed at the workshops</p>
2.5	To minimise the visual impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. The scope of this procedure outlines the guidelines of waste management to be followed as well as include information relating to the correct separation, storage, disposal and removal of waste from the mine. As stipulated in the procedure, waste is separated as follows:</p> <ul style="list-style-type: none"> General waste – Yellow bins/skips (Removed by Phambilli on a weekly basis) Industrial waste – Green bins/skips (Removed by Phambilli on a weekly basis) Scrap metal – Blue bins/skips (Removed by Greenfloyd on a weekly basis) Hazardous waste – Black and/or red bins/skips (removed by Phambili for disposal at Holfontein H:H site) Paper – White bins/skips (Removed by Phambilli on an <i>ad hoc</i> basis). <p>All waste produced is collected and disposed of / recycled by external contractors (safe disposal safe disposal certificates and manifests are provided to KBC and are readily available for review) as follows:</p> <ul style="list-style-type: none"> Domestic waste – Phambili (disposed of at Witbank or Middelburg municipal landfill site). Industrial waste – Phambili. Hazardous waste – Phambili. Medical wastes (such as used straws, used masks, contaminated bandages etc.) – Phambili Scrap metal – Greenfloyd. Paper – Phambili Fluorescent tubes – Hazco Green Solutions. Old oil – eMalahleni Oil Collections.
2.6	Parts are neatly stacked and packed in an orderly manner within the storage areas.	Compliant	The Induction program includes slides on neatness of work areas. Site observations showed that equipment is neatly packed at working areas.
2.7	To reduce the depletion and contamination of water, mitigation measures include water awareness by	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the


Condition number	Condition	Finding	Observation/ Audit Evidence
	employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.		The mine implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
2.8	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	<p>A SAP system is used at KBC, for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. The schedule on this system includes the following information:</p> <ul style="list-style-type: none"> • Date of Service • Plant / equipment type • Plant / equipment no. • Service Type • Last Service (in hours) • Date the service was completed.
2.9	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	<p>Gas monitors are not installed at all of the workshops but on specific machines instead. Handheld gas monitors are also present within the various workshops. Gas monitoring is undertaken at various sections of the mine by the ‘Ventilation Occupational Health & Engineering’ (VOHE) officer and reports are recorded. Signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.</p>
2.10	To minimise the impacts on aesthetics and surface water resources from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as ‘hazardous waste’ in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non- ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC 026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Also included are requirements relating to Covid-19 pandemic PPE requirements.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>

Condition number	Condition	Finding	Observation/ Audit Evidence
	waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		
2.11	All employees wear the appropriate PPE to protect themselves. MSDS sheets are available in all storage areas specific for the products which are stored in these areas.	Compliant	Employees at the mine are required to wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn. Examples were verified during the audit of MSDSs being kept at the various workshops and storage areas.
2.12	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
2.13	To minimise the visual impact and impact on land capability from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly	Compliant	The mine has developed and implemented a <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
2.14	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	Hazardous waste skips are required to be placed inside bunds. Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> . All spillages at KBC are managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.
2.15	To minimise the visual impact and impact on land capability from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.

Condition number	Condition	Finding	Observation/ Audit Evidence
	designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		
2.16	To minimize the impact of crushing fluorescent tubes on the employees, KK employees must wear PPE in these areas. Fluorescent tubes are crushed and contained in 210 litre drums. Fluorescent tubes are stored in these drums within the hazardous waste area. These areas contain a bunded area with a concrete floor. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Not Applicable	This EMPr condition no longer applies as fluorescent tubes are not allowed to be crushed since August 2016. In terms of the National Norms and Standards for the Disposal of Waste to Landfill, 2013 published under the National Environmental Management: Waste Act 59 of 2008 (“NEMWA”) (GNR 636 of 23 August 2013), Hazardous Waste Electric and Electronic Equipment – Lamps may no longer be disposed at a landfill. All used fluorescent tubes are collected by a contractor. The contractor provides disposal bags in which the fluorescent tubes are temporarily stored after which the bags are collected by a contractor (Hazco) for safe disposal.
2.17	Fluorescent tubes are crushed in enclosed drums therefore the fumes are contained in these drums.		
2.18	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
2.19	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on the aesthetics, surface and groundwater resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
2.20	To minimise the impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as ‘hazardous waste’ in	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. It was observed on site that old oil was collected and stored in bunded areas with a concrete floor and removed by eMalahleni Oil Collections which is an approved contractor. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.

Condition number	Condition	Finding	Observation/ Audit Evidence
	designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non- ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.		
2.21	Redundant machinery and parts should be sold/recycled as frequently as possible.	Compliant	Redundant machinery is drained of oil and fuel prior to it being temporarily stored at the erection yard or salvage yard (depending on size). The redundant machinery is then cut-up for scrap, auctioned or sold – e.g., an old dragline that was cut-up and sold as scrap metal in 2018/2019.
2.22	Redundant machinery should be drained of all oils and fuel before it is stored in the designated areas. If oil/fuel spillages occur, the oil/fuel spillage procedure should be implemented. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system		
3. Drills & Shovels			
3.1	To minimise the visual impact from hazardous waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as ‘hazardous waste’ in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
3.2	To minimise the impact of oil/fuel spillages on land capability KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous	Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed

Condition number	Condition	Finding	Observation/ Audit Evidence
	waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.		of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also reported to the environmental department and logged as an incident on the Enablon system. On-site observations confirmed that spill kits are kept on site.
3.3	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources and soil reserves, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system		
3.4	KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
3.5	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
3.6	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. Proof hereof was made available during the audit.
3.7	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas	Compliant	As previously described, gas monitors are not installed at all the workshops but on specific machines instead. Handheld gas monitors are also present within the various workshops. Gas monitoring is undertaken at various sections of the mine by the 'Ventilation Occupational Health & Engineering' (VOHE) officer and reports are recorded. Signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section. 'Visibly Felt Leadership' campaigns are held every Tuesday at all active workshops. All staff

Condition number	Condition	Finding	Observation/ Audit Evidence
	masks (when necessary) to protect themselves.		undergo pre-medical examinations and post-medical examinations upon leaving the mine.
3.8	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	As described in detail in Section 2.1 above, water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
3.9	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
3.10	To minimise the impact caused by electrical cleaner spillages KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. No evidence of recent oil spillages was identified.
3.11	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> . Site observations confirmed that numerous bunds are in place and well designed and constructed.  <p>An example of bunding in place at the workshops</p>
3.12	All equipment is maintained regularly. Well maintained	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance

Condition number	Condition	Finding	Observation/ Audit Evidence
	equipment results in a reduction in the emissions of unnecessary fumes.		on equipment. This system also tracks the progress as well as completion of the maintenance activities.
3.13	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the <i>Multi Gas Instrument</i> log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Site observations showed that signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.
3.14	To minimise the visual impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
3.15	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.

Condition number	Condition	Finding	Observation/ Audit Evidence
3.16	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	<p>Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.</p> <p>Site observations confirmed that numerous bunds are in place and well designed and constructed.</p> <p>All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.</p>
3.17	To minimise the impact on land capability from hazardous waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>
3.18	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean up procedure.	Compliant	<p>Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.</p> <p>Site observations confirmed that numerous bunds are in place and well designed and constructed.</p> <p>All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.</p>
3.19	To minimise the impact on land capability from hazardous waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>

Condition number	Condition	Finding	Observation/ Audit Evidence
3.20	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	<p>Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.</p> <p>Site observations confirmed that numerous bunds are in place and well designed and constructed.</p> <p>All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.</p>
3.21	To minimise the impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC 026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>
3.22	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	<p>Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.</p> <p>Site observations confirmed that numerous bunds are in place and well designed and constructed.</p> <p>All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.</p>
3.23	To minimise the visual impact from hazardous and scrap metal waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Safe disposal certificates are supplied to	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC 026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>

Condition number	Condition	Finding	Observation/ Audit Evidence
	KK by the waste contractors to show that the waste has been disposed of correctly.		
3.24	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	<p>Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.</p> <p>Site observations confirmed that numerous bunds are in place and well designed and constructed.</p> <p>All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.</p>
3.25	To minimise the visual impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>
3.26	The store is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	<p>Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.</p> <p>Site observations confirmed that numerous bunds are in place and well designed and constructed.</p> <p>All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.</p>
3.27	<p>To minimise the visual impact from hazardous and scrap metal waste, KK employees and visitors adhere to the waste management and waste separation procedures.</p> <p>All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur.</p>	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC 026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>

Condition number	Condition	Finding	Observation/ Audit Evidence
	Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		
3.28	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
3.29	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the <i>Multi Gas Instrument</i> log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Site observations showed that signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.
3.30	To minimise the impacts on aesthetics and surface water resources from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
3.31	All employees wear the appropriate PPE to protect themselves. MSDS sheets are available in all storage areas specific for the products which are stored in these areas.	Compliant	All employees at the mine must wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn. It was also identified that the MSDS specific to all products stored, are kept at the various workshop and storage areas.
3.32	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked	Compliant	Fuel consumption (inclusive of Zizwe contractor activities such as management of the Klippan and Blaauwkrans Dump) and electricity usage are monitored and recorded on Enablon on monthly basis.


Condition number	Condition	Finding	Observation/ Audit Evidence
	on a monthly basis. KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines. Employee Awareness to reduce unnecessary energy wastage.		Environmental Management System (“EMS”) meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed. Energy use is recorded, however energy usage and saving projects are no longer run at the mine but would continue if new energy saving opportunities are identified.
3.33	The workshop is bunded (bund walls are maintained according to the bund wall maintenance procedure) and the floor is concreted therefore electrical cleaner spills can be contained within these areas. Any spillage which is not absorbed by the absorptive material is washed into the oil/silt traps (which are maintained according to the oil/silt trap maintenance procedure). These areas also contain spill kits for the employees to make use of in the event of an electrical cleaner spillage and spills are cleaned up according to the spillage clean-up procedure.	Compliant	Bund wall requirements around hazardous substances at KBC are also implemented according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> . Site observations confirmed that numerous bunds are in place and well designed and constructed. All spillages at KBC are supposed to be managed according to the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> and all workshops at KBC are equipped with spill kits / saw dust bins to manage, contain and clean up any spillages.
3.34	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines. Employee Awareness to reduce unnecessary energy wastage.	Compliant	Fuel consumption (inclusive of Zizwe contractor activities such as management of the Klippan and Blaauwkrans Dump) and electricity usage are monitored and recorded on Enablon on monthly basis. Environmental Management System (“EMS”) meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed. Energy use is recorded, however energy usage and saving projects are no longer run at the mine but would continue if new energy saving opportunities are identified.
3.35	Spill absorbent kits are available in areas where spills can occur. To minimize the impact of spillages on soil reserves, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Examples of spill kits on sites were noted during the audit.
3.36	Awareness of employees and contractors. Testing for PCBs and signage on transformers which contain PCBs,	Compliant	Transformers that contain PCBs are marked with the appropriate signage and are inspected on a regular basis and monitored annually by a SANAS accredited external contractor. KBC confirmed that should a transformer be found to contain high PCB levels, the respective transformer is inspected on a more regular basis (every quarter). The level of PCBs is also monitored and may not exceed 50 ppm. It was reported that no transformers exceed the 50 ppm limit.
3.37	Spill absorbent kits are available in areas where spills can occur. To minimize the impact of spillages on soil reserves, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected



Condition number	Condition	Finding	Observation/ Audit Evidence
	contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.		with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Examples of spill kits on sites was observed during the audit.
4. Section: Electrical Pumping			
4.1	Water is only pumped when it has accumulated to a certain level. Pumps are switched off when not in use.	Compliant	Water is only pumped from the pit when it has reached a certain level or is required for the safe continuation of mining. All pumps that are not in use remain switched off until pumping is required. Pumps are reportedly not running unnecessarily. It was however determined that should Ramp 9's pump be switched off, it would present a real problem as the pit would flood.
4.2	To minimise the impact of oil/fuel spillages on land capability KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	As per Section 2.9 above, <i>KBC has implemented the Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. Where spillage occurs on bare soil, the contaminated soil is scraped off to the depth of contamination and disposed in the hazardous waste bins or skips. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
5. Section: EMV Workshops			
5.1	Correct storage of batteries. Placing batteries on drip trays when removed from equipment. Correct disposal of oil batteries into the hazardous waste bins (red bins) which are located in bunded areas with concreted floors.	Compliant	All old batteries are placed on drip trays when removed from vehicles and in a bunded area within the EMV Workshop. It was further determined that old batteries are not disposed of, but rather removed off site by the contractor when new batteries are brought onto site.
5.2	All bulk fuel and oil is stored in a bunded area with a concrete floor. The bunded area must be able to contain 110% of the maximum storage volume. Any spillage which occurs in these areas is pumped into red hazardous drums which are either sent to the salvage yard or collected by a contractor. Remaining material within the bund is clean using absorbent material which is disposed of in the hazardous waste bin/skip.	Compliant	The bulk storage of fuels and oils is conducted within a bunded area capable of containing 110% of the maximum storage volume.
5.3	Redundant machinery should be drained of all oils and fuel before it is stored in the designated areas. If oil/fuel spillages occur, the oil/fuel spillage procedure should be implemented. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap	Compliant	As previously described, redundant machinery is drained of oil and fuel prior to being temporarily stored at the erection yard or salvage yard (size dependent) where after it is cut-up for scrap, auctioned or sold. Refer also Section 2.19 with regards to spillage management as implemented at the mine.

Condition number	Condition	Finding	Observation/ Audit Evidence
	system.		
5.4	KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is supposed to cease immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
5.5	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Site observations revealed spill kits on sites.
5.6	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees. Reporting incidents and only washing machines in designated areas which contain oil/silt traps. Silt traps must be cleaned out regularly.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
5.7	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
5.8	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees. Reporting incidents and only servicing machines in designated areas which contain oil/silt traps. Silt traps must be cleaned out regularly. Spill	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on

Condition number	Condition	Finding	Observation/ Audit Evidence
	absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.		environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department. KBC has also implemented the Khwezela hydrocarbon and chemical handling procedure (AATC026497). The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop.
5.9	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	Khwezela Waste Management Procedure (AATC 026501). Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
5.10	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is an environmental share topic on a fortnightly basis and SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
5.11	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.

Condition number	Condition	Finding	Observation/ Audit Evidence
	material are washed into a silt/oil trap system.		
5.12	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
5.13	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	As per Section 2.9 above, KBC has implemented the Khwezela hydrocarbon and chemical handling procedure (AATC026497). The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
5.14	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the Khwezela Waste Management Procedure (AATC026501). Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
5.15	KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap	Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be

Condition number	Condition	Finding	Observation/ Audit Evidence
	system. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.		reported to the environmental department and logged as an incident on the Enablon system.
5.16	Water awareness by employees. Reporting incidents and only washing machines in designated areas which contain oil/silt traps. Silt traps must be cleaned out regularly.	Compliant	<p>As described in detail in Section 2.1 above, water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.</p> <p>Furthermore, all machinery and vehicles are washed in designated areas where the contaminated water enters the dirty water channels and is conveyed to oil / silt traps. The separated oil is pumped into 210 litre drums prior to being removed by an external contractor, the contaminated water is conveyed to the Plant Return Water Dam (for reuse in the process) and the silt is removed from the silt traps as and when required (deposited onto Klippan Co-disposal Facility).</p> <p>All oil / silt traps at the mined are cleaned in accordance with the procedure <i>Khwezela oil and silt trap clean out procedure (AATC026500)</i>.</p>
6. Section: Field Diesel Workshop			
6.1	Redundant machinery and parts should be sold/recycled as frequently as possible.	Not Compliant	Redundant machinery is not drained of oil and fuel prior to being temporarily stored at the Field Diesel Workshop. Because of this, a number of hydrocarbon spills/leaks were noted during site observations. The leaks were not cleaned-up as per existing procedures.
6.2	Redundant machinery should be drained of all oils and fuel before it is stored in the designated areas. If oil/fuel spillages occur, the oil/fuel spillage procedure should be implemented. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.		 <p><u>The parking area at Field Diesel Workshop where numerous hydrocarbon leaks and spills were observed</u></p>


Condition number	Condition	Finding	Observation/ Audit Evidence
			 <p><u>A diesel fuel or other type of hydrocarbon spillage, unattended to at the Field Diesel Workshop parking area</u></p>  <p><u>Another example of a hydrocarbon spillage left unattended to at the Field Diesel Workshop</u></p>
6.3	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Not Compliant	<p>As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i>. The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.</p> <p>This however was not undertaken at the parking area of the Field Diesel Workshop area as observed during the site visit. Numerous hydrocarbon spills/leaks were noted in the area and these were not clean-up as per the existing protocols in place.</p>
6.4	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented</p>

Condition number	Condition	Finding	Observation/ Audit Evidence
	hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		
6.5	Redundant machinery should be drained of all oils and fuel before it is stored in the designated areas. If oil/fuel spillages occur, the oil/fuel spillage procedure should be implemented. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	This is a repeat, already described under Clause 6.2.
6.6	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
6.7	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Not Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is supposed to cease immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also supposed to be reported to the environmental department and logged as an incident on the Enablon system. This however was not undertaken at the parking area of the Field Diesel Workshop area as observed during the site visit. Numerous hydrocarbon spills/leaks were noted in the area and these were not clean-up as per the existing protocols in place.
6.8	All new/used chemicals are stored in the hazardous materials store. 210 litre drums are not stacked on top of one another. These areas contain bunded area with a	Compliant	Site observations confirmed that chemicals are stored within bunded and cement lined areas with spill kits available. All 210 litre drums are stored on level surface and not on top of one another.

Condition number	Condition	Finding	Observation/ Audit Evidence
	concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur.		
6.9	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. Proof hereof was made available.
6.10	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the <i>Multi Gas Instrument</i> log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Site observations showed that signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.
6.11	All bulk fuel and oil is stored in a bunded area with a concrete floor. The bunded area must be able to contain 110% of the maximum storage volume. Any spillage which occurs in these areas is pumped into red hazardous drums which are either sent to the salvage yard or collected by a contractor. Remaining material within the bund is clean using absorbent material which is disposed of in the hazardous waste bin/skip. KK makes use of a 'correct refuelling procedure' which ensures that all mine vehicles are refuelled correctly as to minimize the impacts on environment.	Compliant	<p>Mine employees explained that all bulk fuel, oil and lubricants, at the field diesel workshop area, are stored within a bunded area (with a concrete floor) that can contain 110% of the maximum storage volume.</p> <p>The mine has also implemented correct refuelling procedures which are kept at each refuelling bay.</p> <p>As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i>. The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.</p>
6.12	All bulk fuel and oil is stored in a bunded area with a concrete floor. The bunded area must be able to contain 110% of the maximum storage volume. Any spillage which occurs in these areas is pumped into red hazardous drums which are either sent to the salvage yard or collected by a contractor. Remaining material within the bund is clean using absorbent material which is disposed of in the hazardous waste bin/skip. KK makes use of a 'correct refuelling procedure' which ensures that all mine vehicles are refuelled correctly as to minimize the impacts on environment. KK makes use of a bund wall maintenance procedure.		
6.13	All silt traps are inspected weekly. Silt traps are cleaned out using a TLB which deposits the silt in a designated area for drying. Once the material is dry enough, it is loaded and disposed of.	Compliant	<p>The silt trap located at the Field Diesel washbay area is inspected on a regular basis. Silt accumulating within the silt trap is removed and disposed of onto the Klippan Co-disposal Facility.</p> <p>All contaminated runoff water from the washbay and washbay silt trap enter the dirty water channel from where it conveyed to the oil / silt trap adjacent to the Plant Return Water Dam.</p>




The bulk oil storage facility behind the Field Diesel Workshop

Condition number	Condition	Finding	Observation/ Audit Evidence
			 <p>The silt trap situated adjacent (north) of the Field Diesel Workshop</p>
6.14	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees. Reporting incidents and only washing machines in designated areas which contain oil/silt traps. Silt traps must be cleaned out regularly.	Compliant	As described in detail in Section 2.1 above, water awareness training is provided to employees during induction training (training records available). Employees also receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, placed on the Enablon system and reported to the environmental department, as confirmed by a review of the incident register.
6.15	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
6.16	To minimise the visual impact from hazardous waste, KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>
6.17	All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur.		
6.18	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using	Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of

Condition number	Condition	Finding	Observation/ Audit Evidence
	oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system		into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
6.19	All new/used chemicals are stored in the hazardous materials store. 210 litre drums are not stacked on top of one another. These areas contain bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur.	Compliant	Site observations confirmed that chemicals are stored within bunded and cement lined areas with spill kits available. All 210 litre drums are stored on level surface and not on top of one another. As per Section 2.9 above, KBC has implemented the Khwezela hydrocarbon and chemical handling procedure (AATC026497). The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
6.20	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. Proof hereof was made available.
6.21	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the Multi Gas Instrument log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.
6.22	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
6.23	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
6.24	KK employees and visitors adhere to the waste management and waste separation procedures. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Safe disposal	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.

Condition number	Condition	Finding	Observation/ Audit Evidence
	certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		
6.25	The floor of the oil separation plant is concreted and the separated oil is stored in tanks until it is removed by the appointed contractor.	Compliant	Site observations indicate that the floor of the oil separation plant is cement lined and the oil tanks are situated within a bunded area, designed to hold 110% of the capacity as required in terms of the aforesaid commitment. However, it is noted that the oil separation plant was only operational for approximately 6 months after its commencement in 2006 and due to the poor quality of the purified oil, the plant is no longer operational.
6.26	The floor of the oil separation plant is concreted and the separated oil is stored in tanks until it is removed by the appointed contractor.		
6.27	A small berm has been constructed to the one side of the oil separation plant to help divert any surface water runoff (specifically when it rains) away from the plant.	Compliant	The oil separation plant is located within the dirty water management area. It was explained that all dirty water runoff from this area would drain to the dirty water management channels and be conveyed towards the oil/silt trap that is situated adjacent to the Plant Return Water Dam (to 2A Dam). A small berm is in place such that run-off is directed around the facility to the affected water channels.
6.28	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	As described above, the oil separation plant was only operational for approximately 6 months after its commencement in 2006. The oil separation plant is no longer operational, and oil is no longer stored within the tanks situated at the plant. As per previous discussions, spill kits are available in various location at KBC, with spill kits identified at the EMV workshops directly adjacent to the oil separation plant.
6.29	All silt traps are inspected weekly. Silt traps are cleaned out using a TLB which deposits the silt in a designated area for drying. Once the material is dry enough, it is loaded into the hazardous waste skips.	Compliant	As described in Section 6.13 above, all silt traps are inspected on a regular basis. The silt traps are cleaned with the use of a TLB to deposit the silt in a designated drying area. Once the material is dry, the material is collected, transported and disposed of onto the Klippan Co-disposal Facility.
6.30	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees. Reporting incidents and only washing machines in designated areas which contain oil/silt traps. Silt traps must be cleaned out regularly.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the "Izindaba" which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
6.31	Tyres are stored in an enclosed store which is designated for tyre storage.	Compliant	It was found that tyres are stored at the tyre bay of KBC, located adjacent to the EMV workshops. Further, tyres are repaired for re-use within the Tyre Bay Workshop area. A tyre storage facility is also located to the east of the Field Diesel Workshop and hard park area and is used for the storage of new EMV tyres. It was explained that the facility is enclosed by fencing with an access gate and the respective fire breaks have been implemented.
6.32	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. Proof hereof was made available. No evidence was identified, suggesting that regular maintenance of vehicles, equipment and machinery was not being conducted.

Condition number	Condition	Finding	Observation/ Audit Evidence
6.33	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves. The tyre bay contains extractor fans to expel any fumes from the building.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the Multi Gas Instrument log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Site observations showed that signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.
6.34	Tyres are stored in an enclosed store which is designated for tyre storage.	Compliant	As with condition 6.31, according to mine employees, tyres are stored at the tyre bay of KBC, located adjacent to the EMV workshops. Further, tyres are repaired for re-use within the Tyre Bay Workshop area. A tyre storage facility is also located to the east of the Field Diesel Workshop and hard park area and is used for the storage of new EMV tyres. It was explained that the facility is enclosed by fencing with an access gate and the respective fire breaks have been implemented.
6.35	To minimise the impact on land capability from tyres, KK employees and visitors adhere to the waste management and waste separation procedures. Tyres are classified as hazardous waste. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	Waste tyres may no longer be disposed of at waste disposal facilities. This is in accordance with the Waste Tyre Regulations, 2017 (GN 1064 of 29 September 2017). Old tyres are therefore not disposed of into the red waste bins and skips but are rather taken to the on-site waste tyre storage facility. The mine also makes use of old tyres to designate access roads around the mine as well to designate parking bays at the hard park area. The <i>Khwezela Waste Management Procedure</i> (AATC026501) classifies the tyres as industrial waste and are managed accordingly.  <u>Bokgoni has allocated an area as a used tyre storage facility having a berm around</u>
6.36	KK is in the process of contacting a waste contractor to remove all old tyres from the site. This will reduce the visual impact which currently exists from the waste tyre stack in the field. KK are also in the process of amending their contracts with tyre suppliers to include removal of old tyres from the mine by the suppliers	Compliant	It was explained that KBC can no longer comply with this commitment as a waste contractor may no longer remove old tyres from the site. Tyres are not removed any longer. Old HME tyres are also used to designate access roads and to demarcate parking bays within the dirty water management areas. KBC operates and manages a waste tyre storage facility. The facility is enclosed with a berm. It was noted that a fire break is still to be created around the facility.
6.37	KK has a fire team which tries to control the fire (veld fires) before they reach the waste tyre stack (situated in the field).	Compliant	KBC has implemented the <i>Khwezela emergency preparedness procedure</i> (AATC010464), in which fires have been identified as an emergency situation with a high risk. KBC also has a fire team that is located next to the salvage yard, along with all firefighting equipment.

Condition number	Condition	Finding	Observation/ Audit Evidence
7. Section: HMS Plant			
7.1	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	As described in detail in Section 2.1 above, water awareness training is provided to employees during induction training (training records are available). Employees also receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, placed on the Enablon system and reported to the environmental department, as confirmed by a review of the incident register.
7.2	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
7.3	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the Multi Gas Instrument log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Signage indicating the minimum required PPE to be worn is located throughout the mine and is specific to each section.
7.4	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the waste management procedure. All domestic waste, as collected by the contractor, is taken to the Middleburg municipal landfill facilities with safe disposal certificates and waste manifests provided.
7.5	All employees wear the appropriate PPE to protect themselves. MSDS sheets are available in all storage areas specific for the products where are stored in these areas.	Compliant	Employees at the mine have to wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present at the mine's operational areas indicating the required PPE to be worn. It was also reported that the MSDSs specific to all products stored, are kept at the various workshop and storage areas.
8. Section: Processing Plant Instrumentation			

Condition number	Condition	Finding	Observation/ Audit Evidence
8.1	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	As described in detail in Section 2.1 above, water awareness training is provided to employees during induction training. Employees also receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, placed on the Enablon system and reported to the environmental department.
8.2	KK employees must wear PPE in these areas. Fluorescent tubes are crushed and contained in 210 litre drums. Fluorescent tubes are stored in these drums within the hazardous waste area. These areas contain a bunded area with a concrete floor. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	Refer to Section 2.5 and Section 2.16 above, with regards to PPE requirements and waste management.
8.3	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	Water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
8.4	To minimize the visual impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as ‘hazardous waste’ in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
8.5	Radioactive sources are fitted throughout the Plant for	Compliant	Signage indicating that a person is currently entering the radiation zone are displayed at every entrance to

Condition number	Condition	Finding	Observation/ Audit Evidence
	measuring of levels and densities. Such installations are clearly indicated by “Danger radioactive areas” symbolic signs. When a source needs to be disposed of a certified company will be contacted to dispose of the source in compliance with the Hazardous Substance act no 15 of 1973. New sources will be stored with the supplier and will only be brought onto site the day of the installation.		the plant as there are radiation sources within the plant. Mine personnel confirmed that radioactive sources are installed and / or removed from site by certified external contractors. No radioactive sources were installed or removed during the audit review period.
9. Section: ROM Section			
9.1	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	As described in detail in Section 2.1 above, water awareness training is provided to employees during site induction that are presented weekly where water and waste topics are included. The mine also implements several awareness campaigns such as the “Izindaba” which is a Khwezela newsletter distributed daily. Environmental topics are refreshed in these newsletters on a fortnightly basis. SHE topics are presented on a monthly basis to raise environmental awareness amongst employees. As part of induction and training, employees receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, recorded on the Enablon system and reported to the environmental department.
9.2	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	KBC has implemented the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
9.3	All equipment is maintained regularly. Well maintained equipment results in a reduction in the emissions of unnecessary fumes.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
9.4	Gas monitors are installed in the workshop to detect gas levels. In the event that the gas concentrations exceed the thresholds for the gas being monitored, the alarm signal will be activated and will cease only once the levels have restored to normal. In some areas, Employees and contractors wear PPE including gas masks to protect themselves.	Compliant	As previously described, gas monitors are not installed at all of the workshops, but rather only on certain machinery. Further, handheld gas monitors are also present within the various workshops with the Multi Gas Instrument log sheet and data records provided for review. Discussions with mine personnel confirmed that gas monitoring is undertaken at various sections of the mine by the VOHE officer with reports thereof generated. Examples of signage indicating the minimum required PPE to be worn on site was observed on site.
9.5	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees have to abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.

Condition number	Condition	Finding	Observation/ Audit Evidence
	contractors to show that the waste has been disposed of correctly.		
9.6	Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting.	Compliant	Scrap metal is collected in blue bins / skips and is taken to the salvage yard. The scrap metal at the salvage yard is sorted and collected by an external contractor for further recycling. Waste manifests were determined to be available. As of 2021 scrap is no longer taken to the salvage yard for sorting, since all scrap is removed from source.
9.7	To reduce the depletion and contamination of water, mitigation measures include water awareness by employees (waste not want not principle), Reporting and fixing of leaks, ensuring fire hydrants are not leaking and closing taps when not making use of the water to clean the workshop.	Compliant	As described in detail in Section 2.1 above, water awareness training is provided to employees during induction training. Employees also receive training on environmental emergencies and the manner in which these emergencies are to be reported. As included in the induction programme, all incidents are to be reported to the supervisor, placed on the Enablon system and reported to the environmental department.
9.8	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	As per Section 2.9 above, KBC has implemented the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
9.9	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees are required to abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
9.10	All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. Hazardous wastes are removed monthly by contractors and disposed of at their certified hazardous waste site.	Compliant	The temporary storage of hazardous waste at the salvage yard (pending if sorting etc. is required), is conducted in terms of the <i>Khwezela Waste Management Procedure (AATC026501)</i> . The storage of hazardous waste at the salvage yard is in red skips and bins. The hazardous waste is stored within the cement lined and bunded area within the salvage yard. As described in Section 2.5 above, all hazardous

Condition number	Condition	Finding	Observation/ Audit Evidence
9.11	Hazardous waste areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Hazardous wastes are removed monthly by contractors and disposed of at their certified hazardous waste site.		<p>waste is collected by an external contractor for safe disposal. Samples of safe disposal certificates and waste manifests were verified at the time of the audit.</p> <p>Spill kits as well fire extinguishers are available within the salvage yard.</p> <p>Electronic waste from the mine is also taken to the salvage yard for temporary storage. Electronic waste is stored within two blue skips as located on a cement lined and bunded area of the salvage yard. Electronic waste is collected by an external contractor for safe disposal.</p> <p>Scrap metal, once sorted, is temporarily stored in blue skips on the cement lined area after which it is collected by an external contractor.</p> <p>Items within the salvage yard are also auctioned off or sold to employees. Such items that are sold include corrugated roof sheeting, wheel-barrows, old geysers, steel bars, old ladders and wooden pallets.</p>
9.12	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees are required to abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>
9.13	Ambient air concentrations of bacteria should be measured upwind and downwind of the tanks.	Not Compliant	No monitoring of ambient air concentrations of bacteria has been conducted, upwind and downwind of the Kleinkopje sewage treatment plant. This is impractical as the facility is not enclosed. It is for this reason that Khwezela has submitted an amendment application to the DMR on 17 February 2021 that will include amendment of this specific condition as well. While this amendment application has not been approved, this technical non-compliance will continue.
9.14	All employees who work at the sewage plants go for biological testing and wear the appropriate PPE (full overalls, boots, gloves and eye protection). The Correct management and control of sewage works procedure is followed.	Compliant	<p>Biological testing of employees operating the Kleinkopje sewage treatment plant is undertaken, with proof kept on record.</p> <p>As previously described, signage is present at each operational area of the mine that indicates the minimum PPE requirements to undertake activities within each area which includes the sewage treatment plant.</p>
9.15	All employees who work at the sewage plants go for biological testing and wear the appropriate PPE (full overalls, boots, gloves and eye protection). The Correct management and control of sewage works procedure is followed.		The treated sewage effluent from the Kleinkopje sewage treatment plant is discharged into the Plant Return Water Dam, for re-use in the processing plant.
9.16	Waste water or effluent is treated and tested according to the guideline for sewage effluent quality	Compliant	Waste water and effluent water quality monitoring is conducted on a monthly basis for the Kleinkopje Sewage Treatment Plant. The water quality analysis is undertaken and assessed against the General

Condition number	Condition	Finding	Observation/ Audit Evidence
			Standards for waste water discharge as per GN. 665, Revision of general authorisations in terms of Section 39 of the National Water Act, 1998 (Act No. 36 of 1998) dated 06 September 2013. Furthermore, the Plant Return Water Dam is also monitored on a monthly basis as per Condition 3.1 of Appendix IV of the Water Use Licence (Licence No. 04/B11J/AFGJ/1416). This is also confirmed in the <i>Anglo Coal Bokgoni Colliery Annual Water Quality Assessment Report January – December 2019</i> .
9.17	All material removed from silt traps are placed in a designated area for drying out. Once the material is dried, it is placed in a hazardous waste bin for disposal by a contractor. Solid waste is placed in designated bins around the site (sorted according to the waste separation and disposal procedure).	Compliant	As mentioned above, KBC has implemented the <i>Khwezela oil trap and silt trap clean out procedure (AATC026500)</i> that stipulates the procedures for cleaning of oil and silt traps. Silt removed from the oil/silt traps is placed in designated areas to dry out. Dry silt is then collected, transported and disposed of onto the Klippan Co-disposal Facility. The silt traps located at the tip and north of the plant have all been equipped with silt dry beds or designated areas within the affected water management system.
9.18	To prevent potential damage to water equipment (pumps) by random, scattered waste, all solid waste is disposed of in the designated bins available in the workplace. This waste is later emptied into bigger telecom bins/skips by the cleaners.	Compliant	Refer to the findings and recommended actions as presented Section 2.5 above with regards to waste management practices implemented.
9.19	Dirty water used for cleaning is used in designated dirty water areas that drain into the dirty water system so as to prevent the contamination of the clean water system with the dirty water.	Compliant	Wash water emanating from the washbays is conveyed via dirty water trenches to the oil / silt trap adjacent to the Plant Return Water Dam where after it is discharged into the Plant Return Water Dam for re-use in the process.
9.20	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines. Employee Awareness to reduce unnecessary energy wastage.	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System (“EMS”) meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed.
10. Section: Office Activities (including Payroll, HR, training centre, management, geology, survey, planning, safety, mining and plant)			
10.1	Paper from offices is disposed of into the paper recycling boxes/white ‘wheely’ bins placed at strategic points and this is recycled.	Compliant	Refer to the findings as presented Section 2.5 above. Paper to be disposed of is collected within white bins where after it is collected for recycling by an external paper recycler.
10.2	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines. Employee Awareness to reduce unnecessary energy wastage.	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System (“EMS”) meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed.
11. Section: Stores			
11.1	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in	Compliant	As mentioned above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.

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	the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. All fuel/oil/chemical storage areas are bunded and the floors of these areas are concreted.		
11.2	All below ground tanks are placed in concrete lined pits. Pressure tests are conducted (by Shell) annually to check for leaks. The area on the surface where the diesel/petrol pumps are located are concreted to ensure it is impermeable to spillages. Spill absorbent kits are available in areas where fluid petroleum product spills can occur. The drilling on monitoring boreholes around the underground tanks, to evaluate possible spillages from the tanks, will be investigated as part of the Geohydrological Assessment (2012) – Appendix L.	Compliant	Mine personnel confirmed that all below ground tanks are placed within concrete lined pits. Pressure testing is conducted on all underground storage tanks and a report by Clean Fuel Technologies indicating the same was verified during audit. It was noted that one tank applies to Bokgoni and its pressure tests were passed. No groundwater monitoring localities have been implemented in the vicinity of the underground storage tanks. However, a review of the <i>Annual Water Quality Assessment Report January – December 2019</i> compiled by Aquatico confirmed that downstream groundwater monitoring localities are in place.
11.3	Refilling of the vehicle is done at a safe, level place once the diesel nozzle has been inserted into the filling valve/diesel tank. All trucks on the mine must be filled up at the service bay. Refuelling of mine vehicles is done according to Kleinkopje's correct refuelling procedure. Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	The refuelling station located at the office block has entrenched procedures for refuelling including: <ul style="list-style-type: none"> • Applying parking brake. • Switch off engine. • Secure the vehicle by inserting stop blocks. Refer also to the findings as presented in Section 2.19 above, with regards to the procedures implemented for the clean-up of spillages.
11.4	KK adhere to a handling, storage and disposal of hazardous substances procedure.	Compliant	The mine has developed and implemented a procedure <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> . The aims of this procedure are to: <ul style="list-style-type: none"> • Identify the chemicals with their associated risks; • Ensure correct handling of chemicals; • Indicate the correct storage of chemicals and hydrocarbons; • Ensure that used or old chemicals are disposed of / recycled correctly according to the type and the risks it poses; • Record incidents related to chemical and hydrocarbon spillage on Enablon; • Outline the correct clean-up methods in the case of spillage; • Reduce or eliminate the possible risk a spillage poses to the environment.
11.5	MSDS sheets are displayed in the storage areas. Hazardous materials stored are enclosed by a bund wall or trench – these are designed to contain 110% of the total volume stored within these areas. Bunded areas are inspected monthly and maintained according to the bund wall maintenance procedure.	Compliant	The MSDSs of all of the hazardous chemicals and substances are kept on site and /or displayed where the substances are stored. Bunded areas are designed to contain 110% of the total volume stored and are inspected on a monthly basis by the environmental team and workshop owners.

Condition number	Condition	Finding	Observation/ Audit Evidence
11.6	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	<p>As mentioned above, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i>. The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb.</p> <p>An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.</p>
11.7	Spill absorbent kits are available in areas where spills can occur. To minimize the impact of spillages, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. Storage areas are bunded and concreted.		
11.8	Paper from offices is disposed of into the paper recycling boxes/white 'wheely' bins placed at strategic points and this is recycled. To minimise impact from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i>. Waste collection, separation and storage are well conducted across the mine and all employees are required to abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented. Paper to be disposed of is collected within white bins where after it is collected for recycling by an external paper recycler.</p>
12. Section: Utilities Block			
12.1	No medical waste is generated on the mine. Employees are not treated on site (taken to hospital).	Compliant	Mine personnel confirmed that no medical waste is generated by or stored on the mine. Employees who feel ill are treated at the Highveld Hospital.
13. Section: Mineral Waste Disposal			
13.1	Coal spillages are managed according to the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long	Compliant	<p>Coal, discard and slurry spillages that may occur at KBC are managed in accordance with the <i>Khwezela Coal Discard and Slurry Spillage Procedure (AATC025073)</i>.</p> <p>The procedure requires the following actions to be taken in the event of a slurry leak and spillage:</p> <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline;

Condition number	Condition	Finding	Observation/ Audit Evidence
	periods in the environment.		<ul style="list-style-type: none"> • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the Klippan discard dump. <p>Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system.</p>
13.2	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Doghouse sheeting is installed on the overland conveyors to minimise dust during conveying. Water cannons and sprayers are installed on the pit walls and dumps to control Spontaneous combustion.	Compliant	<p>KBC has developed and implemented a procedure <i>Khwezela Monitoring and Measurement Procedure (AATC023928)</i>. The main objectives of this procedure are to:</p> <ul style="list-style-type: none"> • Describe monitoring requirements at Khwezela Colliery; • Describe when exceedances are considered as incidents / legal non-conformances and how it must be managed; • Describe how monitoring equipment should be maintained (calibrated). <p>The mine also has a <i>Dust fallout monitoring procedure, doc no AATC026379, Rev 0</i>. A total of 10 dust fall out monitoring localities of which one is directional buckets.</p> <p>Both the product conveyor and the discard conveyor are covered with doghouse sheeting to minimise dust during conveying.</p> <p>The mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion. Water cannons were also in place at the ROM stockpiles to control spontaneous combustion according to mine personnel.</p>
13.3	Employees and contractors wear PPE including gas masks (when necessary) to protect themselves	Compliant	Refer to the findings and recommended actions as presented in Section 2.3 above with regards to signage indicating the PPE requirement within specific areas.
13.4	All hazardous waste (oil rags) are removed from the area or maintenance and disposed of in red waste bins marked as 'hazardous waste' in designated areas. All domestic waste (paper and litter) is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. Scrap metal (spare parts) waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. In the event that a spill does occur which may impact on surface water, maintenance vehicles contain spill kits and spills are cleaned up according to the spills clean-up procedure.	Compliant	The Klippan Co-disposal Facility is operated by an external contractor (Zizwe) on behalf of KBC, however, the handling of waste is still conducted in accordance with the <i>Khwezela Waste Management Procedure (AATC026501)</i> .
13.5	All discard material is wet when it is laid down to prevent dust generation. Particulate dust is monitored frequently.	Compliant	<p>Discard material leaving the plant is wet, as a result of the process, and is still wet when disposed onto the Klippan Co-disposal Facility. It was further indicated by mine staff that dust suppression is conducted on the Klippan Co-disposal Facility when required.</p> <p>As previously described, in Section 13.2 above, particulate dust and dust monitoring is conducted on a monthly basis with 10 monitoring localities distributes across the mine as well as adjacent landowners.</p>
13.6	Water from the slurry compartments gets pumped to the water treatment plant.	Compliant	A barge is located in the slurry compartments for the pumping of the water to the main Pollution Control Dam ("2A Dam"). Water from the 2A Dam is then either pumped to the Fire Hydrant Dam or the Plant Return Water Dam for re-use in the process or pumped to the ARMS Tank, from where it is pumped to the EWRP for treatment. Water is only pumped to the EWRP for treatment should there be a surplus of contaminated water.
13.7	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the	Compliant	As previously described, although the Klippan Co-disposal Facility is operated by a contractor, the operation is managed in terms of the mine's procedures.

Condition number	Condition	Finding	Observation/ Audit Evidence
	impact of spillages on the aesthetics, surface and groundwater resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.		As per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> , In the event of a spillage, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. Refer to the findings and recommended actions as presented in Section 2.19 above.
13.8	All hazardous waste (oil rags) are removed from the area or maintenance and disposed of in red waste bins marked as 'hazardous waste' in designated areas. All domestic waste (paper and litter) is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. Scrap metal (spare parts) waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. In the event that a spill does occur which may impact on surface water, maintenance vehicles contain spill kits and spills are cleaned up according to the spills clean-up procedure.	Compliance	As previously described, although the Klippan Co-disposal Facility is operated by a contractor, the operation is managed in terms of the mine procedures. Waste separation and management at the Klippan Co-disposal Facility are conducted in accordance with the Khwezela Waste Management Procedure (AATC026501). Refer also to Section 13.4 above. As per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> , in the event of a spillage, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. Refer to the findings and recommended actions as presented in Section 2.19 above.
13.9	All below ground tanks are placed in concrete lined pits. Pressure tests are conducted (by Shell) annually to check for leaks. The area on the surface where the diesel/petrol pumps are located are concreted to ensure it is impermeable to spillages. Spill absorbent kits are available in areas where fluid petroleum product spills can occur.	Compliance	Mine personnel confirmed that the one below ground tank applies for Bokgoni and are placed within concrete lined pits. It was further confirmed that pressure testing is conducted on an annual basis for such tanks. The latest pressure test report dated 18 December 2019 was reviewed during the audit and found that all the pressure tests were passed. Furthermore, it was confirmed that the diesel/petrol pumps are situated within a concrete lined and bunded area to contain the hydrocarbon material in the event of a spill.
13.10	Cut off trenches have been installed around the dump to assist with clean and dirty water separation. All seepage of water from the dump is reused or pumped to the water treatment plant. Monthly monitoring of surface water and groundwater in these areas occurs.	Compliance	Cut-off trenches were constructed around the Klippan Co-disposal Facility for the collection and conveyance of seep water to the Plant Return Water Dam (currently being desilted) for re-use in the process. Surface- and groundwater monitoring is conducted at KBC. There is currently one dam monitoring locality, three process water and five groundwater monitoring localities situated in close proximity to the Klippan Co-disposal Facility and associated cut-off trenches.
13.11	Slimes dump is reshaped and sloped for revegetation and rehabilitation to a wilderness land capability.	Not Applicable	The slimes dump (Klippan Co-disposal Facility) is still operational and not yet fully rehabilitated. A portion of the co-disposal facility sidewalls have been rehabilitated. Rehabilitation of the sidewalls ceased, due to the proposed reworking of the Klippan Co-disposal Facility as part of the Khanyisa IPP project.
13.12	In the event of a pipe leak or burst: The affected slurry pipeline is flushed. Pumps are switched off. Burst / leaking pipe is fixed. Slurry is allowed to dry out and removed. Cleaned up spillage is disposed onto the discard dump. All slurry spillage reports to a dirty water catchment area. Regular inspections of the lines are conducted to detect possible pipe failures.	Compliance	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela Coal Discard and Slurry Spillage Procedure (AATC025073)</i> . As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system.
13.13	KK adheres to a topsoil stripping and placement procedure. Live placement of topsoil occurs. The topsoil	Compliance	Refer to Section 13.11 above with regards to the rehabilitation of the side walls of the co-disposal facility. Further, KBC has implemented the <i>Topsoil Management Procedure, (AATC016071)</i> that provides for the

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	is seeded and covered to reduce erosion. KK also adheres to a usable soil management procedure to ensure correct placement of usable soil, to maximise soil recovery and reduce soil loss due to erosion (Appendix I).		correct procedure for management of topsoil stripping within the mining cut to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, mining staff explain that the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Topsoil stockpiling is prevented as far as possible, with live placement of all topsoil as stripped. Some old topsoil dumps are located on the mine, and will be utilised during the future mine rehabilitation activities.
13.15	KK adheres to a topsoil placement procedure. A topsoil placement plan is designed by the Rehabilitation Officer and Survey Office to indicate areas where Red Soils (e.g. Hutton), yellow-brown soil (e.g. Clovelly and Avalon) and wetland soil (e.g. Katspruit) need to be placed (see Appendix I).	Compliant	Refer previous discussions under Section 13.13, A <i>Spoil dosing procedure</i> has been developed and adhered to by the mine. The mine has not stripped topsoil for over a year. Volumes and placement thickness, tipping procedure and heap spacing on sloped and levelled areas are all taken into account when handling topsoil.
13.16	Seeding and revegetation of soil stockpiles occurs to reduce dust generated. Monthly dust fallout monitoring is conducted to detect air quality impacts so that these impacts can be managed quickly and effectively	Compliant	As per previous discussions under Section 13.13, live placement of topsoil has been undertaken – unless windy conditions prevail on site, with no topsoil stockpiling being done (except some old dumps that have over time revegetated through natural succession). Refer to the findings and recommended actions as presented in Section 13.2 above for a detailed description of the air quality and dust fallout monitoring programme as well as the results thereof.
13.17	The Landau I dump has been revegetated and is fully rehabilitated.	Compliant	The Landau I dump was revegetated and is fully rehabilitated approximately 20 years ago, and the management of the area has been handed over to Anglo Department of States.
13.18	Thermal surveys are conducted in this area to detect for any spontaneous combustion. Spontaneous combustion is managed according to the Management of Spon Com Procedure.	Compliant	Thermal surveys were undertaken, with provided report <i>Remote Thermal Imaging Old Landau I and II Mining Area</i> , May 2013. No further thermal surveys have been conducted. Spontaneous combustion status is reviewed on a weekly basis (as tracked by the geology department) in accordance with the Khwezela KPI performance matrix.
13.19	The area around Landau II dump is fenced off.	Compliant	The area has been fenced off with warning signs erected. The mine has also provided a trench around the area to limit access.
13.20	Groundwater qualities, levels and volumes within and leaving the mine area will be monitored at an interval necessary for effective water management and to ensure that the impact to downstream users is minimised. Remining of the dump for the potential Discard power station will remove all impacts to groundwater resources.	Compliant	As previously described, the mine conducts quarterly groundwater quality and level monitoring. KBC has also appointed an external contractor Aquatico Scientific and Regen Waters to conduct quarterly and annual water quality monitoring respectively for submission to the DWS. The potential to remine the dump is still under investigation.
13.21	Thermal surveys are conducted including gas and temperature monitoring. If any spontaneous combustion is found due to surface subsidence or the formation of an inlet to underground, the open area is filled up with soil and sealed.	Compliant	Gas and temperature monitoring are undertaken as part of the thermal surveys, as per previous discussions under Section 13.18, with the last thermal survey conducted in May 2013. Since 2005/2006 sinkholes started to become evident within the area, and as previously discussed, access restriction measures were implemented to prevent access within the area. As indicated by KBC, as sinkholes are identified often by security usually when venting is observed, the survey department will investigate and quantify the extent after which a quote is obtained.
13.22	Area is fenced off to prevent entry to the dump. A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	Refer previous discussions under Section 13.19. A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required.
13.23	Thermal surveys are conducted in this area to detect for any spontaneous combustion. Spontaneous combustion	Compliant	Thermal surveys were undertaken, with provided report <i>Remote Thermal Imaging Old Landau I and II Mining</i>

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	is managed according to the Management of Spon Com Procedure. This dump will potentially be re-mined for the potential proposed Discard power Station. This will reduce impacts on land capability as the dump will be removed.		Area, May 2013. No further thermal surveys have been conducted. Spontaneous combustion status is reviewed on a weekly basis (as tracked by the geology department) in accordance with the Khwezela KPI performance matrix. Khwezela Colliery has also appointed a Spontaneous Combustion Head of Department.
13.24	Landau III discard dump toe dam collects acid water seeping from the toe of the dump polluted runoff. KK are planning to pump this water to the water treatment plant directly. Cut-off trenches have been constructed around this dam.	Compliant	KBC has environmental authorisation for the re-mining of the Landau III Discard Dump (DMR Ref. No.: (M) 30/5/1/2/3/2/1/(307)EM). Refer also to Chapter 5.3 and Chapter 6.2 of this environmental audit report. A concrete cut-off trench was constructed around the facility to divert all affected water runoff towards the sump, for pumping to the EWRP. Such trenches are also isolated from the Landau III discard dump toe dam with such toe dam no longer in use.
13.25	90% of the dump has been rehabilitated. This includes compaction and cladding with topsoil as well as revegetation to reduce dust generation.	Not Applicable	This commitment refers to rehabilitation activities associated with the Landau III Discard Dump. However, as KBC has an approved EMPr and EA to remine the dump, with such remining activities already commenced (refer to above discussions). This commitment is no longer applicable.
13.27	90% of the dump has been rehabilitated therefore air/gas generation has reduced. Thermal surveys are conducted to detect for SponCom and gasses.	Not Applicable	This commitment refers to rehabilitation activities associated with the Landau III Discard Dump. However, as KBC has an approved EMPr and EA to remine the dump, with such remining activities already commenced (refer to above discussions). This commitment is no longer applicable.
13.28	Used building rubble is used to fill erosion gullies. Dump will potentially be re-mined for the proposed Discard Power Station.	Not Applicable	This commitment refers to rehabilitation activities associated with the Landau III Discard Dump. However, as KBC has an approved EMPr and EA to remine the dump, with such remining activities already commenced (refer to above discussions). This commitment is no longer applicable.
13.29	Landau III will be compacted, clad with topsoil and revegetated to promote surface water runoff. Manage stormwater runoff from the dumps. Revegetate dumps to prevent soil erosion and to enhance visual quality	Not Applicable	This commitment refers to rehabilitation activities associated with the Landau III Discard Dump. However, as KBC has an approved EMPr and EA to remine the dump, with such remining activities already commenced (refer to above discussions). This commitment is no longer applicable.
14. Section: Plant Process			
14.1	Tip sprays are operation at all times to reduce dust generation. No coal tipping is allowed when the sprays are not operational.	Compliant	Tip sprayers are operational (as observed) at all times and it was further confirmed that no tipping is conducted when the sprayers are not operational.
14.2	Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 2.3 above.
14.3	Tip sprays are operation at all times to reduce dust generation. No coal tipping is allowed when the sprays are not operational.	Compliant	As described above in Section 14.1, it was identified that the tip sprayers (as observed) are operational at all times with no tipping conducted when the sprayers are not operational.
14.4	Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 2.3 above.
14.5	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. Noise monitors have not been fitted in any areas as per risks identified. Monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine and conducted by Gijima Occupational Hygiene and Environmental Services.
14.6	Tip sprays are operation at all times to reduce dust generation. No coal tipping is allowed when the sprays are not operational.	Compliant	As described above in Section 14.1, it was explained that the tip sprayers are operational at all times with no tipping conducted when the sprayers are not operational.
14.7	Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 2.3 above.
14.8	KK has implemented various energy saving projects which include the replacing of old geysers with new,	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System (“EMS”) meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are

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	more energy efficient models; installing day-night switches on office lights as well as on machines.		discussed. Refer also to Section 3.32 above.
14.9	Automatic level detectors have been installed. If an overflow occurs, this flows into the dirty water circuit.	Compliant	Automatic level detectors were installed on the clarified tanks that are situated within the dirty water management system. Therefore, any overflow will drain into the dirty water channels and be conveyed to an oil/silt trap where after the contaminated water will be conveyed to the PRWD for re-use in the process.
14.10	KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines.	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System (“EMS”) meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed. Refer also to Section 3.32 above.
14.11	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073). Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records available.
14.12	KK uses potable water. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Potable water is used at KBC (except for coal washing and dust suppression) and is also included in the quarterly and annual water quality assessment reports that are submitted to the DWS. As described in Section 13.1, coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing.
14.13	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073). Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system (records available for review). No concerns in this regard were identified during the site audit.
14.14		Compliant	The conveyor belts are only operational when necessary for the transport of ROM coal in the plant, discard

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	Conveyors are only operational when it is necessary.		material to the Klippan Co-disposal Facility or the transport of final product to the RLT.
14.15	KK has a fire team which is dispatched when a fire is reported. Fire extinguishers are kept at strategic points on the mine.	Compliant	KBC has implemented the <i>Khwezela emergency preparedness procedure (AATC010464)</i> , in which fires have been identified as an emergency situation with a high risk. KBC also has a fire team that is located next to the salvage yard, along with all firefighting equipment.
14.16	Employees and contractors wear the appropriate PPE.	Compliant	Employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn. It was also reported that the MSDS specific to all products stored, are kept at the various workshop and storage areas. Refer also to the findings as presented in Section 2.4 above.
14.17	Overland conveyors are enclosed by Doghouse sheeting is installed on the overland conveyors to minimise dust and noise during conveying.	Compliant	As described in Section 13.2 above, both the product conveyor as well as discard conveyor are covered with doghouse sheeting to minimise dust and noise during conveying.
14.18	Old oil is recycled according to the recycling and management of used oil procedure.	Compliant	No recycling and management of used oil procedure was available. The management and recycling of old oil is, however, described in the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Refer also to Section 2.5 for a discussion on the collection and safe disposal of old oil.
14.19	All new/used chemicals are stored in the hazardous materials store. 210 litre drums are not stacked on top of one another. These areas contain bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur.	Compliant	Mine personnel confirmed that 210 litre drums are not allowed to be stored on top of one another. Refer to the findings and recommended actions as presented in Section 2.19 above.
14.20	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	As previously described, although the Klippan Co-disposal Facility is operated by a contractor, the operation is managed in terms of the mine's procedures. As per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i> , in the event of a spillage, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. Refer to the findings and recommended actions as presented in Section 2.19 above.
14.21	Radioactive sources are fitted throughout the Plant for measuring of levels and densities. Such installations are clearly indicated by "Danger radioactive areas" symbolic signs. Any person who has to work in the close vicinity of a radioactive source must get the technician superintendent to close and lockout the source shutter. The responsible foreman of any section who wants to work on equipment equipped with a nuclear source must request the technician superintendent, stating which day and time he wishes to work there. The technician superintendent will give clear verbal instructions to the stand-by technician to isolate the source at the specific time and day. Technician superintendent will then contact the responsible foreman confirming the request and give exact details of who must isolate the source. The stand-by technician will be responsible for physically locking-out the source in	Compliant	Refer to the findings and recommended actions as presented in Section 8.5 above

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	position. The Technician/Mechanic will remove the lock from the open position. He will then move the shutter to the closed position. He will then lock it with the responsible artisan for the task lock out lock. The responsible artisan will keep the key for the lock. It is then safe for work to commence. On completion of the task the person who was working there must contact the standby technicians that the radioactive source can be unlocked. The stand-by technician will immediately open the source and secure it in the on position. This is part of the Lock out procedure and everybody will be trained on an annual basis.		
14.22 & 14.23	Water is reused in the plant. Clean and dirty water infrastructure is in place.	Compliant	Clean and dirty water separation is conducted at the mine with dirty water management infrastructure in place in order to convey contaminated surface water runoff to the oil/silt traps and to the PRWD. All mine affected water is also re-used in the plant or used for dust suppression (until end-2020) with excess mine water pumped to the EWRP for treatment.
14.24	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073). Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records kept.
14.25	To minimise the visual impact from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure</i> (AATC026501). Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
14.26	Water is sprayed on coal at transfer points in the plant and at the ROM stockpiles. Water cannons are installed at the stockpiles.	Compliant	ROM coal within the plant was kept wet at all times in order to minimise dust generation. Water cannons were according to mine staff in place to suppress spontaneous combustion on the ROM stockpiles.
14.27	Employees wear gas masks where necessary and other relevant PPE.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.

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			Refer also to the findings and recommended actions as presented in Section 2.4 above.
14.28	Flocculent is kept in a closed circuit.	Compliant	Mine personnel confirmed that flocculent is kept in a closed circuit.
14.29	Water quality is monitored and water is reused.	Compliant	As previously described, the mine conducted monthly surface and groundwater quality and level monitoring. KBC has also appointed an external contractor Aquatico Scientific to conduct quarterly surface and groundwater quality monitoring, the reports of which are submitted to the DWS on a quarterly and annual basis. All mine affected water was also re-used in the plant or used for dust suppression (until end-2020) with excess mine water pumped to the EWRP for treatment. Regen Waters also conduct quarterly groundwater monitoring.
14.30	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. Based on a risk assessment as conducted by the mine no noise monitors have been fitted in any areas. Monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental services.
14.31	Slurry/coal and magnetite spillage during coal beneficiation within the HMS plant: Coal spillages are managed according to the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re-processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073). Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records available.
14.32	Coal spillage from the coal silos, crushing, screening and the conveyors: Coal spillages are managed according to the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re-processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment		
14.33	Conveyors are only operational when it is necessary.	Compliant	Mine staff explained that the conveyor belts are only operational when necessary for the transport of ROM coal in the plant, discard material to the Klippan Co-disposal Facility or the transport of final product to the RLT.
14.34	KK has a fire team which is dispatched when a fire is reported. Fire extinguishers are kept at strategic points on the mine.	Compliant	KBC has implemented the <i>Khwezela Emergency Preparedness Procedure</i> (AATC010464), in which fires have been identified as an emergency situation with a high risk. KBC also has a fire team along with all firefighting equipment.
14.35	Employees and contractors wear the appropriate PPE.	Compliant	Employees at the mine must wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn. It was also determined that the MSDSs specific to all products stored, are kept at the various workshop and storage areas. Refer also to the findings and recommended actions as presented in Section 2.4 above.
14.36	Overland conveyors are enclosed by Doghouse sheeting is installed on the overland conveyors to minimise dust and noise during conveying.	Compliant	As described in Section 13.2 above, site observations showed that both the product conveyor as well as discard conveyor were covered with doghouse sheeting to minimise dust and noise during conveying.
14.37	Old oil is recycled according to the recycling and	Compliant	The management and recycling of old oil is described in the <i>Khwezela Waste Management Procedure</i>

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	management of used oil procedure.		(AATC026501). Refer also to Section 2.5 for a discussion on the collection and safe disposal of old oil.
14.38	To minimise the impacts on aesthetics, land capability and surface water resources from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
14.39	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance with the <i>Khwezela coal discard and slurry spillage procedure (AATC025073)</i> . Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system (records available for review).
14.40	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas. Monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation hygiene and Environmental Services.
14.41	To minimise the impacts on aesthetics, land capability and surface water resources from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees have to

Condition number	Condition	Finding	Observation/ Audit Evidence
	domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.		abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
14.42	In the event of a pipe leak or burst: The affected slurry pipeline is flushed Pumps are switched off Burst / leaking pipe is fixed Slurry is allowed to dry out and removed Cleaned up spillage is disposed onto the discard dump. All slurry spillage reports to a dirty water catchment area. Regular inspections of the lines are conducted to detect possible pipe failures.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073). As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records available.
14.43	Employees wear appropriate PPE for these areas. MSDS sheets are available.	Compliant	All employees at the mine have to wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn. It was also determined that the MSDSs specific to all products stored, are kept at the various workshop and storage areas. Refer also to the findings and recommended actions as presented in Section 2.4 above.
14.44	Employees wear masks and other appropriate PPE.		
14.45 & 14.46	To minimise the visual impact and impact on land capability from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure</i> (AATC026501). Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
14.47	Control on the amount of magnetite used.	Compliant	Magnetite is only used as and when required in the process, the use of which is calculated according to a formula based on the volume of ROM coal being processed at the time. The magnetite consumption sheets were confirmed during the audit.
14.48	The Key Performance Indicators (KPI) for 2010- 2011	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System meetings are

Condition number	Condition	Finding	Observation/ Audit Evidence
	are 14% less than the previous year and the KPIs are checked on a monthly basis. In order to ensure better fuel efficiency, vehicles are maintained on a regular basis. To prevent unnecessary fuel wastage, vehicles are not left to idle when not in use.		held where the monthly monitoring results, trends and proposed actions and initiatives are discussed. Refer also to Section 3.32 above.
14.49	KK has implemented various energy saving projects. Dredger and pumps are switched off when not in use to conserve electricity.	Compliant	Pumps (and all other equipment or machines for that matter) remain switched off until such a time that they are required for the conveyance of water from the PRWD to the Plant or the 2A Dam – this is a safety principle at the mine.
14.50	Cleaned up silt is deposited in a designated area for drying. Once the material is dry enough, it is loaded and disposed of on the discard dump.	Compliant	As described above in Section 9.17, it was determined that silt removed from the oil/silt traps is placed in designated areas to dry out and once dry, it is collected, transported and disposed of onto the Klippan Co-disposal Facility. KBC has also implemented the <i>Khwezela Oil Trap and Silt Trap Clean Out Procedure (AATC026500)</i> that stipulates the procedures for cleaning of oil and silt traps.
14.51	In the event of a pipe leak or burst: The affected slurry pipeline is flushed Pumps are switched off Burst / leaking pipe is fixed Slurry is allowed to dry out and removed Cleaned up spillage is disposed onto the discard dump. All slurry spillage reports to a dirty water catchment area. Regular inspections of the lines are conducted to detect possible pipe failures.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance with the <i>Khwezela coal discard and slurry spillage procedure (AATC025073)</i> . As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system (records available for review).
14.52	Cleaned up silt is deposited in a designated area for drying. Once the material is dry enough, it is loaded and disposed of on the discard dump.	Compliant	As described above in Section 9.17, it was determined that silt removed from the oil/silt traps is placed in designated areas to dry out and once dry, it is collected, transported and disposed of onto the Klippan Co-disposal Facility. KBC has also implemented the <i>Khwezela Oil Trap and Silt Trap Clean Out Procedure (AATC026500)</i> that stipulates the procedures for cleaning of oil and silt traps.
14.53	Drainage from this areas must be directed back into the return water dam so as to prevent it from being released into the clean water system	Compliant	As described above as well as in Section 9.17, silt removed from the PRWD and its associated silt trap is placed adjacent to the dam to dry. Therefore, all contaminated water emanating from the silt drains back into the PRWD. Refer also to the findings as in Section 9.17 and Section 14.52 above.
14.54	To minimise the visual impact and impact on land capability from domestic waste (litter), KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
14.55	Dirty water (pollution control dams) will be rehabilitated on upon closure.	Compliant	KBC was in the operational phase for going into care and maintenance. This EMPr commitment was not yet applicable as the commitment relates to closure.
14.56	A clean and dirty water separation system – dirty water eventually goes to 2A dam. Dirty water is contained in dams for reuse or it is pumped to the water treatment plant.	Compliant	KBC has clean and dirty water separation system. 2A Dam is currently the mine's main pollution control dam, to which contaminated water is pumped. As described above, the 2A Dam will be mined through as part of the Pit 2A expansion project. Therefore, the Plant Return Water Dam will be the main pollution control dam at KBC.

Condition number	Condition	Finding	Observation/ Audit Evidence
			<p>2A Dam receives contaminated water from the following sources:</p> <ul style="list-style-type: none"> • Dewatering activities (dewater boreholes, ramps and sumps). • Plant Return Water Dam. • Klippan Co-disposal Facility. • Overflow from the ARMS Tanks and Ericson 1 and 2 dams. <p>The contaminated water from 2A Dam is then either pumped to the Plant Return Water Dam or the Fire Hydrant dams for reuse in the process or, contaminated water is pumped from 2A Dam to the ARMS Tank after which it is pumped to the EWRP for treatment.</p> <p>2A Dam is generally managed in a manner to retain 10% of its full capacity.</p>
14.57	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	<p>Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073).</p> <p>As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage:</p> <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. <p>Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records kept.</p>
14.58	Tip sprays are operational at all times to reduce dust generation. No coal tipping is allowed when the sprays are not operational.	Compliant	As described above in Section 14.1, tip sprayers are always operational with no tipping taking place when the sprayers are not operational.
14.59	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	<p>Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073).</p> <p>As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage:</p> <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. <p>Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records kept.</p>
14.60	Sprays are operation at all times to reduce dust generation.	Compliant	Sprayers were not operational in order to reduce dust generation as the mine moved into Care and Maintenance phase.
14.61	Employees wear PPE including gas masks where necessary.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.
14.62	Sprays are operation at all times to reduce dust generation.	Compliant	Sprayers were operational at all times in order to reduce dust generation.
14.63	Employees wear PPE including gas masks where necessary.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.
14.64	Tip sprays are operation at all times to reduce dust	Compliant	As described above in Section 14.1, tip sprayers are operational at all times with no tipping taking place

Condition number	Condition	Finding	Observation/ Audit Evidence
	generation. No coal tipping is allowed when the sprays are not operational.		when the sprayers are not operational.
14.65	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, the some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. This, as well as the adherence of employees to these requirements, were observed. No noise monitors have been fitted in any areas. Monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
14.66	Cut-off drains have been installed, either in the form of trenches or berms, to direct clean runoff into drainage systems and away from polluted areas. Oil and silt traps are used on the mine as part of dirty and clean water management. Dirty water is re-used in the plant to minimise the impact on water. Monthly surface water and groundwater monitoring takes place in order to detect early changes for better management of the impact	Compliant	KBC has implemented dirty water trenches to direct contaminated water away from the operational area and towards the oil/silt traps and eventually towards the Plant Return Water Dam.
14.67	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re-processing. Spillages are cleaned-up daily, which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073). Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records kept.
14.68	Sprays are operation at all times to reduce dust generation	Compliant	As described above in Section 14.1, tip sprayers were operational at all times with no tipping taking place when the sprayers are not operational.
14.69	Employees wear PPE including gas masks where necessary.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.
14.70	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, the some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas. Monthly noise monitoring is however conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
14.71	Spontaneous combustion is managed according to the Management of Spon Com Procedure	Compliant	The spontaneous combustion status is reviewed on a weekly basis (as tracked by the geology department) in accordance with the Khwezela KPI performance matrix.
14.72	Water is sprayed on coal at transfer points in the plant and at the ROM stockpiles. Water cannons are installed	Compliant	ROM coal within the plant was kept wet in 2020 in order to minimise dust generation.

Condition number	Condition	Finding	Observation/ Audit Evidence
	at the stockpiles.		
14.73 & 14.74	Employees wear gas masks where necessary and other relevant PPE.	Compliant	Signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. Photo examples are shown in the report.
14.75	This process occurs in a closed circuit which prevents releases to water. Water is also reused in this process which minimise impacts to surface water resources.	Compliant	Mine affected water is reused in the plant. Process water collects in the Plant Return Water Dam from where water is then pumped back to the Fire Hydrant Dams for reuse in the process.
14.76	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	<p>Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure</i> (AATC025073).</p> <p>Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing.</p> <p>As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage:</p> <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and • Dispose of the cleaned-up spillage onto the discard dump. <p>Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records kept.</p>
14.77	Coal spillages are managed according the coal, discard and slurry spillage procedure. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.		
14.78	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non- ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. Old oil is collected and then stored in a bunded area with a concrete floor until it is removed by an approved contractor.	Compliant	<p>The mine has developed and implemented the <i>Khwezela Waste Management Procedure</i> (AATC026501). Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure.</p> <p>Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.</p>
15. Section: Blasting Operations			
15.1	A dust curtain is installed on the drill. Wet drilling is practiced for dust suppression.	Compliant	Wet drilling was conducted until recently at KBC, which acts as dust suppression to the drilling activities. Drilling rigs are also fitted with rubber flaps that act as drilling curtains.
15.2	KK has implemented various energy saving projects. Drills are switched off when not in use	Compliant	Machinery and equipment at the mine are only switched on when operational. When the equipment and machinery are not in use, it is switched off. Such requirements are also contained with the <i>Anglo American</i>


Condition number	Condition	Finding	Observation/ Audit Evidence
			<i>Fatal Risk Standard</i> that is included in the onsite induction process.
15.3	KK blasting operations take place according to a Blasting Procedure. Holes generated are plugged to prevent air from reaching the underground	Compliant	Blasting activities are undertaken as per the procedure <i>Khwezela Blasting Procedure (AATC026894)</i> with final sign off in June 2018. The aim of the procedure is to: <ul style="list-style-type: none"> • Ensure all blasting operations are carried out safely with due regard to the relevant legal and production activities. • Ensure blasting is conducted in such a manner as to ensure the safety of persons and prevention of damage to property. Plugging of holes generated is only conducted on the interburden.
15.4	Employees wear PPE (earplugs) to protect their ears in areas of noise.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.
15.5	Maintain machinery. Drilling is a short-lived activity so impacts will be minimal.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
15.6	KK blasting operations take place according to a Blasting Procedure. Holes generated are plugged to prevent air from reaching the underground	Compliant	As described in Section 15.3 above, blasting activities are undertaken as per the <i>Khwezela Blasting Procedure (AATC026894)</i> with final sign off in June 2018. Refer also to the findings as presented in Section 15.3 above.
15.7	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
15.8	KK notify all surrounding landowners when they will be blasting. Announce all blasts by means of blast Claxton/siren.	Compliant	Surrounding landowners are notified of blasts. The notifications are recorded in a logbook kept at the Control Room. KBC has also established the Farmers Blasting Notification group, whereby messages are sent to the surrounding landowners via SMS and WhatsApp messages. Blasts are further announced by means of a siren.
15.9	Where possible, make use of sequential detonation of charges rather than simultaneous detonation of all charges in order to reduce both noise and ground shock.	Compliant	It was explained by mine staff that sequential detonation of charges used to take place as all holes are timed, in accordance to the blasting procedure.
15.10	Air quality and dust is monitored on a monthly basis and implement corrective action as required.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above, with regards to the dust fallout monitoring as conducted at KBC.
15.11	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
15.12	Monitor soils in rehabilitated areas and implement corrective action as required.	Compliant	Refer to the findings as presented in Section 23.11 below.
15.13	KK blasting operations take place according to a Blasting Procedure. All personnel are withdrawn to a minimum distance of 500 meters from the blasting area.	Compliant	As described in Section 15.3 above, blasting activities are undertaken as per the <i>Khwezela Blasting Procedure (AATC026894)</i> with final sign off in June 2018. According to the Blasting Procedure, all personnel will be withdrawn to a minimum distance of 500 m for stemmed holes and 700 m for unstemmed holes and all equipment must be withdrawn to a safe distance determined by the miner. The minimum distance to which all personnel are withdrawn is 500 m, however, if uncertain of the distance, they are withdrawn further. Guards are also placed at strategic access points and will remain in place until removed by the miner, after the miner is satisfied that no misfires have occurred, and blast area is safe. Refer also to the findings as presented in Section 15.3 above.
15.14	KK notify all surrounding landowners when they will be	Compliant	Surrounding landowners are notified of blasts. The notifications are recorded in a logbook that is kept at the

Condition number	Condition	Finding	Observation/ Audit Evidence
	blasting. Announce all blasts by means of blast Claxton/siren.		Control Room. KBC has also established the Farmers Blasting Notification group, whereby messages are sent to the surrounding landowners via SMS and WhatsApp messages. Blasts are further announced by means of a siren.
15.15	Monitor noise levels to ensure that noise mitigation measures have been effectively implemented. The use of nonel and/or electronic detonators will reduce the impact of noise generated from blasting.	Compliant	The mine has appointed an external contractor “Blast Management and Consulting” to conduct monthly air blast and ground vibration monitoring. Furthermore, Electronic Delay Detonators (EDD) are used during the blasting process.
15.16	KK blasting operations take place according to a Blasting Procedure. All personnel are withdrawn to a minimum distance of 500 meters from the blasting area.	Compliant	As described in Section 15.3 above, blasting activities are undertaken as per the <i>Khwezela Blasting Procedure (AATC026894)</i> . According to the Blasting Procedure, all personnel will be withdrawn to a minimum distance of 500 m for stemmed holes and 700 m for unstemmed holes and all equipment must be withdrawn to a safe distance determined by the miner. The minimum distance to which all personnel are withdrawn is 500 m, however if uncertain of the distance, they are withdrawn further. Guards are also to be placed at strategic access points and will remain in place until removed by the miner, after the miner is satisfied that no misfires have occurred, and blast area is safe. Refer also to the findings as presented in Section 15.3 above.
15.17	KK notify all surrounding landowners when they will be blasting. Announce all blasts by means of blast Claxton/siren.	Compliant	Surrounding landowners are notified of blasts. The notifications are recorded in a logbook that is kept at the Control Room. KBC has also established the Farmers Blasting Notification group, whereby messages are sent to the surrounding landowners via SMS and WhatsApp messages. Blasts are further announced by means of a siren.
15.18	Monitor noise levels to ensure that noise mitigation measures have been effectively implemented. The use of nonel and/or electronic detonators will reduce the impact of noise generated from blasting.	Compliant	The mine has appointed an external contractor “Blast Management and Consulting” to conduct monthly air blast and ground vibration monitoring and proof hereof was provided in the form of the monthly ground vibration and air blast monitoring reports since January 2018. Furthermore, Electronic Delay Detonators (EDD) are used during the blasting process.
15.19	All spillages are cleaned up rapidly if they occur.	Compliant	Refer to the findings and recommended actions as presented in Section 2.14 and Section 2.19 above, with specific reference to the actions to be taken in the event of a spill. No evidence of a spill of explosives was identified.
15.20	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees have to abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
15.21	KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as ‘domestic waste’ in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump		
15.22	KK blasting operations take place according to a Blasting Procedure. All personnel are withdrawn to a	Compliant	As described in Section 15.3 above, blasting activities are undertaken as per the <i>Khwezela Blasting Procedure (AATC026894)</i> with final sign off in June 2018.


Condition number	Condition	Finding	Observation/ Audit Evidence
	minimum distance of 500 meters from the blasting area.		According to the Blasting Procedure, all personnel will be withdrawn to a minimum distance of 500 m for stemmed holes and 700 m for unstemmed holes and all equipment must be withdrawn to a safe distance determined by the miner. The minimum distance to which all personnel are withdrawn is 500 m, however, if uncertain of the distance, they are withdrawn further. Guards are also to be placed at strategic access points and will remain in place until removed by the miner, after the miner is satisfied that no misfires have occurred, and blast area is safe. Refer also to the findings as presented in Section 15.3 above.
15.23	KK notify all surrounding landowners when they will be blasting. Announce all blasts by means of blast Claxton/siren.	Compliant	Surrounding landowners are notified of blasts. The notifications are recorded in a logbook that is kept at the Control Room. KBC has also established the Farmers Blasting Notification group, whereby messages are sent to the surrounding landowners via SMS and WhatsApp messages. Blasts are further announced by means of a siren.
15.24	Monitor noise levels to ensure that noise mitigation measures have been effectively implemented. The use of nonel and/or electronic detonators will reduce the impact of noise generated from blasting.	Compliant	The mine has appointed an external contractor to conduct monthly air blast and ground vibration monitoring and reports are kept on record. Electronic Delay Detonators ("EDD") are used during the blasting process.
15.25	KK blasting operations take place according to a Blasting Procedure. All personnel are withdrawn to a minimum distance of 500 meters from the blasting area.	Compliant	As described in Section 15.3 above, blasting activities are undertaken as per the <i>Khwezela Blasting Procedure (AATC026894)</i> with final sign off in June 2018. According to the Blasting Procedure, all personnel will be withdrawn to a minimum distance of 500 m for stemmed holes and 700 m for unstemmed holes and all equipment must be withdrawn to a safe distance determined by the miner. The minimum distance to which all personnel are withdrawn is 500 m, however, if uncertain of the distance, they are withdrawn further. Guards are also to be placed at strategic access points and will remain in place until removed by the miner, after the miner is satisfied that no misfires have occurred, and blast area is safe. Refer also to the findings as presented in Section 15.3 above.
15.26	KK notify all surrounding landowners when they will be blasting. Announce all blasts by means of blast Claxton/siren.	Compliant	Surrounding landowners are notified of blasts. The notifications are recorded in a logbook that is kept at the Control Room. KBC has also established the Farmers Blasting Notification group, whereby messages are sent to the surrounding landowners via SMS and WhatsApp messages. Blasts are further announced by means of a siren.
15.27	Monitor noise levels to ensure that noise mitigation measures have been effectively implemented. The use of nonel and/or electronic detonators will reduce the impact of noise generated from blasting.	Compliant	The mine has appointed an external contractor to conduct monthly air blast and ground vibration monitoring and proof hereof was provided in the form of the monthly ground vibration and air blast monitoring reports since January 2018. Furthermore, Electronic Delay Detonators are used during the blasting process.
15.28	Air quality and dust is monitored on a monthly basis and implement corrective action as required.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above, with regards to the dust fallout monitoring as conducted at KBC.
15.29	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine have to wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
15.30	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.

Condition number	Condition	Finding	Observation/ Audit Evidence
16. Section: Coaling			
16.1	Tip sprays are operation at all times to reduce dust generation. No coal tipping is allowed when the sprays are not operational.	Compliant	As described above in Section 14.1, tip sprayers are operational at all times with no tipping taking place when the sprayers are not operational.
16.2	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	<p>Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure (AATC025073)</i>.</p> <p>Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing.</p> <p>As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage:</p> <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and <p>Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system.</p>
16.3	In order to ensure better fuel efficiency, vehicles are maintained on a regular basis. To prevent unnecessary fuel wastage, vehicles are not left to idle when not in use.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
16.4	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Doghouse sheeting is installed on the overland conveyors to minimise dust during conveying.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above.
16.5	Water cannons and sprayers are installed on the pit walls and dumps to control spontaneous combustion.	Compliant	<p>As described in Section 13.2, the mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion.</p> <p>Refer also to the findings and recommended actions as presented Section 13.2.</p>
16.6	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, the some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas, however monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.

Condition number	Condition	Finding	Observation/ Audit Evidence
16.7	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required (<i>Councillor Ward Forum minutes</i> are kept on record and are available for review), or as part of the environmental authorisation application processes for new projects.
16.8	Coal spillages are managed according to the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re-processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure (AATC025073)</i> . Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing. As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage: <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system.
16.9	Water cannons and sprayers are installed on the pit walls control spontaneous combustion. Cladding of burning material with topsoil reduces spontaneous combustion.	Compliant	As described in Section 13.2, the mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion. Refer also to the findings as presented Section 13.2.
16.10	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
16.11	Dirty water is reused. Dirty water is sent to the water treatment plant followed by a controlled release scheme.	Compliant	Mine affected water is re-used in the plant. Water emanating from the operational areas of the mine collects (through a series of trenches and oil/silt) in the Plant Return Water Dam (refer also the findings as presented in Section 9.19). Hereafter it is reused in the process. Furthermore, water from the 2A Dam (the main pollution control dam) is then either pumped to the Fire Hydrant Dam or the Plant Return Water Dam for re-use in the process or pumped to the ARMS Tank after which it is pumped to the EWRP for treatment. Mine affected water is only pumped to the EWRP for treatment should there be a surplus of mine affected water. The EWRP then provides potable and drinking water to the mining operations and the eMalahleni Local Municipality. Surplus treated water is discharged (licenced activity) to the Naauwpoortspruit.
16.12	Pipes are maintained. Old and damaged pipes are replaced.	Compliant	Inspection and maintenance of the pipe lines is undertaken by an external contractor Wega who are responsible for replacing pipes, repairs and leak repairs. Refer also to the findings as presented in Section 13.12 above with specific reference to the replacing of old pipelines.
17. Contractors			

Condition number	Condition	Finding	Observation/ Audit Evidence
17.1	Coal spillages are managed according the coal, discard and slurry spillage procedure. Coal spillages must be removed within a week and tipped onto the ROM Stockpile for re- processing. Spillages are cleaned up daily which minimises their impact on surface water, groundwater and soil quality as they are not left for long periods in the environment.	Compliant	<p>Coal, discard and slurry spillages that may occur at KBC are managed in accordance to the <i>Khwezela coal discard and slurry spillage procedure (AATC025073)</i>.</p> <p>Coal spillages from the overland conveyor can occur at transfer points, at points of incorrect alignment of the conveyor or if the conveyor belt snaps. Inspections are undertaken on the conveyor belts (completed checklists provided for review). All coal spillages are collected manually or mechanically and tipped onto the ROM stockpile for re-processing.</p> <p>As per the procedure, the following actions are to be taken in the event of a slurry leak and spillage:</p> <ul style="list-style-type: none"> • Switch off the pumps; • Flush the affected slurry pipeline; • Fix / replace the burst or leaking pipe; • Let the slurry dry out and remove as much as possible; and <p>Dispose of the cleaned-up spillage onto the discard dump. Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system.</p>
17.2	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Compliant	<p>Dust suppression used to be undertaken on all haul and access roads located in the dirty water management system of the mine, however dust suppression was not being undertaken at the time of the audit.</p>  <p><u>Roads within the mine have not received watering for some weeks resulting in a very fine powder dust easily becoming airborne</u></p>
17.3	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above with regards to the fallout dust monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto.
17.4	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	<p>A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action.</p> <p>Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.</p>
17.5	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, the some areas	Compliant	<p>As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.</p> <p>No noise monitors have been fitted in any areas, however monthly noise monitoring is conducted on</p>

Condition number	Condition	Finding	Observation/ Audit Evidence
	are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.		employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
17.6	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
17.7	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Compliant	As described in Section 17.2, dust suppression is not undertaken on all haul and access roads located in the dirty water management system of the mine.
17.8	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings as presented in Section 13.2 above with regards to the dust fallout monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto.
17.9	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
17.10	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, the some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas, however monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
17.11	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
17.12	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Compliant	As described in Section 17.2, dust suppression is not undertaken on all haul and access roads located in the dirty water management system of the mine.
17.13	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I).	Compliant	Benicon Contractor is no longer on site. The area (Section 2A) where the contractor site was located forms part of the rehabilitation program for the mining area. Progress regarding rehabilitation in this area has been made, with the area already reshaped and rehabilitated, as was found during on-site observations.

Condition number	Condition	Finding	Observation/ Audit Evidence
			 <p>The Section 2A area has been rehabilitated and vegetative cover and shaping commendable</p>
17.14	Dust suppression by wetting down of the unsealed roads.	Not Compliant	As described in Section 17.2, dust suppression used to be undertaken on all haul and access roads located in the dirty water management system of the mine but high volumes of dust emissions were observed on site as dust suppression had ceased for a long time.
17.15	Revegetate rehabilitated areas and manage these areas to ensure long term stability. Replace natural vegetation with improved pasture species. Stabilise soil and minimise erosion. Continuously eradicate alien and exotic species. No specific mitigation is required.	Compliant	Refer previous discussions under Section 17.13. Note that topsoil and seeding of all areas have not yet been undertaken but forms part of the rehabilitation plan of the area.
17.16	In order to ensure better fuel efficiency, vehicles are maintained on a regular basis. To prevent unnecessary fuel wastage, vehicles are not left to idle when not in use.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
17.17	Dust suppression by wetting down of the unsealed roads.	Not Compliant	As described in Section 17.2, dust suppression is not undertaken on all haul and access roads located in the dirty water management system of the mine.
17.18	Restore land to an agreed standard/agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation (see Appendix I).	Compliant	Refer previous discussions under Section 13.13 and Section 17.13.
17.19 & 17.20	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on water and soil, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
17.21	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor	Compliant	Refer previous discussions under Section 13.13 and Section 17.13.

Condition number	Condition	Finding	Observation/ Audit Evidence
	settlement (see Appendix I).		
17.22	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Monthly dust fall out monitoring is conducted to detect air quality impacts so that these impacts can be managed quickly and effectively.	Not Compliant	As described in Section 17.2, dust suppression was not undertaken at the time of the audit and high levels of visible dust was emitted during the audit.
17.23	Wear the correct PPE including face mask to prevent inhalation of dust.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.
17.24	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
17.25	Employees wear PPE (earplugs) to protect their ears in areas of noise.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area.
17.26	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
17.27	KK adheres to a topsoil stripping and placement procedure. Live placement of topsoil occurs. The topsoil is seeded and covered to reduce erosion. KK also adheres to a usable soil management procedure to ensure correct placement of usable soil to maximise soil recovery and reduce soil loss due to erosion (see Appendix I).	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure</i> , (AATC016071) that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Refer to the findings and recommended actions as presented in Section 13.13 above.
17.28	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on the land capability and surface water resources, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	As previously described, all contractors to the mine are required to conduct operations in terms of the mine operational procedures. KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure</i> (AATC026497). The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Refer to the findings as presented in Section 2.19 above.
17.29	Machinery is maintained regularly and switched off when not in use.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
17.30	Spray water on coal at transfer points in the plant and at the ROM stockpiles.	Compliant	ROM coal for processing was kept wet during the transport process in the plant. As previously described, the ROM coal is also kept wet at the tips, with no tipping taking place unless the sprayers are operational.


Condition number	Condition	Finding	Observation/ Audit Evidence
17.31	Employees to wear appropriate PPE including gas masks where necessary	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
17.32	Employees wear PPE (earplugs) to protect their ears in areas of noise. These areas are also clearly marked throughout the mine. In addition to this, some areas are fitted with a noise monitor which monitors the decibels emitted and alerts the workshop employees when the decibels emitted are at unacceptable levels.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas, however monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
17.33	Cut-off drains have been installed, either in the form of trenches or berms, to direct clean runoff into drainage systems and away from polluted areas. Oil and silt traps are used on the mine as part of dirty and clean water management. Dirty water is re-used in the plant to minimise the impact on water as well as for dust suppression on haul roads and at the tips. Monthly surface water and groundwater monitoring takes place in order to detect early changes for better management of the impact	Compliant	It was determined that cut-off trenches were implemented at the old Liketh contractor's area.
17.34	Spray water on coal at transfer points in the plant and at the ROM stockpiles.	Compliant	ROM coal for processing was kept wet during the transport process in the plant. As previously described, the ROM coal was also kept wet at the tips, with no tipping taking place unless the sprayers are operational.
17.35	Employees to wear appropriate PPE including gas masks where necessary	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
17.36	To minimise the visual impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. All hazardous waste is disposed of in red waste bins marked as 'hazardous waste' in designated areas. These areas contain a bunded area with a concrete floor. Spill kits are also installed in these areas to contain any spillage which may occur. Scrap metal waste is disposed of in blue waste bins once it has been separated into ferrous and non-ferrous scrap waste. The non-ferrous scrap is taken to the salvage yard for further sorting. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.

Condition number	Condition	Finding	Observation/ Audit Evidence
	waste has been disposed of correctly.		
17.37	Spray water on coal at transfer points in the plant and at the ROM stockpiles.	Compliant	ROM coal for processing was kept wet during the transport process in the plant. As previously described, the ROM coal was also kept wet at the tips, with no tipping taking place unless the sprayers are operational.
17.38	Employees to wear appropriate PPE including gas masks where necessary	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
17.39	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. Spill trays are placed under the parked vehicle to collect any oil drips.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
17.40	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. KK has implemented various energy saving projects which include the replacing of old geysers with new, more energy efficient models; installing day-night switches on office lights as well as on machines. Employee Awareness to reduce unnecessary energy wastage.	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System ("EMS") meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed. Refer also to Section 3.32 above.
17.41	To minimise the visual impact from solid waste, KK employees and visitors adhere to the waste management and waste separation procedures. All domestic waste is disposed of in yellow waste bins marked as 'domestic waste' in designated areas. These bins are collected on a regular basis and the contents are disposed of at the Witbank Municipal dump. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
17.42	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.

Condition number	Condition	Finding	Observation/ Audit Evidence
17.43	The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system. Spill trays are placed under the parked vehicle to collect any oil drips.	Not Compliant	Apart from the Field Workshop where hydrocarbon spills and leaks were observed at the parking area, contaminated areas were found to be not cleaned or remediated.
17.44	In order to ensure better fuel efficiency, vehicles are maintained on a regular basis. To prevent unnecessary fuel wastage, vehicles are not left to idle when not in use.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. Proof hereof was made available. Further thereto, no vehicles are left idling unattended.
17.45	Spill absorbent kits are available in areas where fluid petroleum product spills can occur. To minimize the impact of spillages on land capability, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system.
17.46	KK employees and visitors adhere to the waste management and waste separation procedures. Industrial waste is disposed of in green waste bins which are disposed of at an approved waste disposal site. Safe disposal certificates are supplied to KK by the waste contractors to show that the waste has been disposed of correctly. All industrial waste will be put on open tender by the Salvage yard co-ordinator.	Compliant	The mine has developed and implemented the <i>Khwezela Waste Management Procedure (AATC026501)</i> . Waste collection, separation and storage are well conducted across the mine and all employees abide by the requirements of the procedure. Refer to the discussions as presented in Section 2.5 above with regards to the waste management practices implemented.
17.47	Paper from offices is disposed of into the paper recycling boxes/white 'wheely' bins placed at strategic points and this is recycled.	Compliant	Refer to the findings and recommended actions as presented Section 2.5 above. Paper to be disposed of is collected within white bins where after it is collected for recycling by the contractor.
17.48	Spray water on coal at transfer points in the plant and at the ROM stockpiles.	Compliant	ROM coal for processing is kept wet during the transport process in the plant. As previously described, the ROM coal is also kept wet at the tips, with no tipping taking place unless the sprayers are operational.
17.49	Employees to wear appropriate PPE including gas masks where necessary	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
17.50	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019 due to Covid-19 restrictions in 2020.
17.51	Employees to wear appropriate PPE (ear plugs).	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.

Condition number	Condition	Finding	Observation/ Audit Evidence
17.52	KK adhere to a topsoil stripping and placement procedure. Live placement of topsoil occurs. The topsoil is seeded and covered to reduce erosion (see Appendix I). KK also adheres to a usable soil management proceeded to ensure correct placement of usable soil to maximise soil recovery and reduce soil loss due to erosion.	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Refer to the findings and recommended actions as presented in Section 13.13 above.
17.53	Spray water on coal at transfer points in the plant and at the ROM stockpiles.	Compliant	ROM coal for processing is kept wet during the transport process in the plant. As previously described, the ROM coal is also kept wet at the tips, with no tipping taking place unless the sprayers are operational.
17.54	Employees to wear appropriate PPE including gas masks where necessary	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
17.55	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019 due to Covid-19 restrictions in 2020.
17.56	Monitor noise levels to ensure that noise mitigation measures have been effectively implemented. Maintain machinery.	Compliant	As described above in Section 14.5, monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine. The mine has also appointed an external contractor to conduct monthly air blast and ground vibration monitoring for which records are available.
17.57	Tip sprays are operation at all times to reduce dust generation.	Compliant	As described above in Section 14.1, tip sprayers were operational during 2020 with no tipping taking place when the sprayers are not operational.
17.58	KK adheres to a topsoil stripping and placement procedure. Live placement of topsoil occurs. The topsoil is seeded and covered to reduce erosion (see Appendix I). KK also adheres to a usable soil management proceeded to ensure correct placement of usable soil to maximise soil recovery and reduce soil loss due to erosion.	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Refer to the findings and recommended actions as presented in Section 13.13 above.
17.59	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I).	Compliant	Refer previous discussions under Section 13.13 and Section 17.13.
18. Section: Dewatering			
18.1	The Key Performance Indicators (KPI) for 2010- 2011 are 3% less than the previous year and the KPIs are checked on a monthly basis. KK has implemented various energy saving projects. Employee Awareness to reduce	Compliant	Fuel and electricity usage are monitored and recorded. Environmental Management System ("EMS") meetings are held where the monthly monitoring results, trends and proposed actions and initiatives are discussed.

Condition number	Condition	Finding	Observation/ Audit Evidence
	unnecessary energy wastage. Pumps are turned off when not in use.		Refer also to Section 3.32 above.
18.2	Monthly surface water and groundwater monitoring takes place in order to detect early changes for better management of the impact Dirty dewatered water is pumped to the eMalahleni water treatment plant for treatment	Compliant	As previously described in Section 13.10 and 13.20 the mine conducts monthly surface and groundwater quality and level monitoring. The mine appointed external contractors Aquatico Scientific and Regen Waters to conduct quarterly and annual surface and groundwater monitoring, the reports of which are submitted to DWS on a quarterly basis. As described in Section 13.6, water from the 2A Dam was then either pumped to the Fire Hydrant Dam or the Plant Return Water Dam for re-use in the process or pumped to the ARMS Tank after which it is pumped to the EWRP for treatment. Affected mine water was only pumped to the EWRP for treatment should there be a surplus of contaminated water. Refer also to previous discussions with regards to the mining through of 2A Dam as part of the Pit 2A expansion project.
18.3	Drawdown is monitored. Monthly surface water and groundwater monitoring takes place in order to detect early changes for better management of the impact	Compliant	As described in Section 13.20 above, the mine conducts monthly groundwater quality and level monitoring. In the event that any of the boreholes return a water level significantly lower than in any other month, an investigation is commenced with to determine to source of the decreasing water level and the appropriate action is implemented. As previously described, the mine has appointed external contractors Aquatico Scientific and Regen Waters to conduct quarterly and annual water quality monitoring respectively for submission to the DWS. Groundwater level monitoring data is also included in the report for submission to the DWS. Drawdown is monitored on a monthly and quarterly basis for the purposes of dewatering activities and to detect changes in the groundwater level. It is, however, important to note that all the monitored groundwater boreholes are situated within the mining area.
19. Section: Pit 2A North			
19.1	Prior to compaction, the topsoil is stripped and placed according to the Topsoil Stripping and Placement procedure.	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Refer to the findings and recommended actions as presented in Section 13.13 above.
19.2	Vegetation is stripped with topsoil and allowed to re-establish on topsoil stockpile to ensure preservation of the seedbank. When mining ceases, the road will be ripped and reseeded to re-establish vegetation.	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. A total strip is conducted by the mine meaning that all vegetation is stripped along with the topsoil. As described, no topsoil stockpiling is currently being conducted by the mine, with live placement of all topsoil as stripped. Some old topsoil dumps are located on the mine and will be utilised during the future mine rehabilitation activities.
19.3	Dust suppression by wetting down of unsealed roads.	Not Compliant	As described in Section 17.2, dust suppression was undertaken on all haul and access roads located in the dirty water management system of the mine but has not been done during the Care & Maintenance phase the mine was moving into. At the time of the audit, it was found that high levels of dust were being emitted from movement of haul trucks on the mine's roads.

Condition number	Condition	Finding	Observation/ Audit Evidence
			 <p><u>Dust suppression has not been undertaken for some time within the mine footprint</u></p>
19.4	Regular maintenance of equipment.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
19.5	Drains will be constructed as v-cut drains immediately adjacent to the road margin. Cut-off drains direct clean runoff into drainage systems (trenches or berms along highwall access roads) and away from polluted areas. Polluted runoff is directed into pollution control dams in a similar manner.	Compliant	Berms and trenches were constructed along the road margin in order to direct contaminated surface water runoff away from the open pit areas and ramps and isolating the clean and dirty water management systems.
19.6	Water cannons and sprayers are installed on the pit walls control dust generation. PM10 monitors have been installed.	Compliant	<p>As described in Section 13.2, the mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion.</p> <p>As described in Section 17.2, dust suppression was not undertaken on all haul and access roads located in the dirty water management system of the mine.</p> <p>As part of the dust fallout monitoring programme two particulate matter monitoring localities have been implemented and include:</p> <ul style="list-style-type: none"> • Du Plessis Farm (Topaz monitor); and • Bokgoni Mag (Topaz Monitor). <p>Refer also to the findings as presented Section 13.2.</p>
19.7	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
19.8	Regular maintenance of the dragline ensures that it is more energy efficient.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities. Proof hereof is available.
19.9	Profile dragline placed spoils and place pre- stripped	Compliant	It was explained that spoils are profiled (in accordance with the rehabilitation designs) and covered with subsoil

Condition number	Condition	Finding	Observation/ Audit Evidence
	subsoil over spoils		and topsoiled as part of the concurrent rehabilitation undertaken by the mine. Refer further discussions on rehabilitation designs, the implementation thereof and verification on compliance thereto.
19.10	Water cannons and sprayers are installed on the pit walls control spontaneous combustion. Cladding of burning material with topsoil reduces spontaneous combustion.	Compliant	As described in Section 13.2, the mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion.
19.11	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
19.12	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Compliant	As described in Section 17.2, dust suppression has not been undertaken on all haul and access roads located in the dirty water management system of the mine.
19.13	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above with regards to the dust fallout monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto identified during the audit process.
19.14	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019 due to Covid-19 restrictions in 2020.
19.15	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Rehabilitation has already been undertaken. Refer previous discussions on rehabilitation designs as per Section 17.13.
19.16	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Compliant	As described above in Section 14.5, monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine (refer also to previous discussions in this regard). The mine has also appointed an external contractor to conduct monthly air blast and ground vibration monitoring and proof hereof is available.
19.17	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Refer to previous discussions under Section 19.15.
19.18	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Keep rehabilitation up to date.	Not Compliant	As described in Section 17.2, dust suppression has not been undertaken on all haul and access roads located in the dirty water management system of the mine.
19.19	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
19.20	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action.

Condition number	Condition	Finding	Observation/ Audit Evidence
	discuss issues.		Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held, and as mentioned, the last one being held on 24 October 2019.
19.21	Wear PPE including earplugs where necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
19.22	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Compliant	As described above in Section 14.5, monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine (refer also to previous discussions in this regard). The mine has also appointed an external contractor to conduct monthly air blast and ground vibration monitoring and proof hereof was provided in the form of the monthly ground vibration and air blast monitoring reports by Blast Management and Consulting since January 2018.
19.23	Stabilise soils and minimise erosion. Re- establish soil nutrient cycling. Conduct periodic soil analysis to determine fertilisation requirements for pasture establishment and maintenance (see Appendix I).	Compliant	As described in Section 22.23 below, revegetation is undertaken to act as erosion control.
19.24	Dust on roads is controlled by wetting down the haul roads or applying dusicides to main haul roads.	Not Compliant	As described in Section 17.2, dust suppression has not been undertaken on all haul and access roads located in the dirty water management system of the mine.
19.25	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above with regards to the dust fallout monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto identified during the audit process.
19.26	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
19.27	Wear PPE including earplugs where necessary. Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas, however monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
19.28	Dust on roads is controlled by wetting down the haul roads or applying dusicides to main haul roads.	Not Compliant	As described in Section 17.2, dust suppression was undertaken on all haul and access roads located in the dirty water management system of the mine, however has not been done during the initial stages of Care & Maintenance the mine has moved into since early 2021.
19.29	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Refer to previous discussions under Section 19.15.
20. Section: Pit 2A South			
20.1	Prior to compaction, the topsoil is stripped and placed according to the Topsoil Stripping and Placement procedure (see Appendix I).	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure

Condition number	Condition	Finding	Observation/ Audit Evidence
			indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has, however, changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Refer to the findings and recommended actions as presented in Section 13.13 above.
20.2 & 20.3	Vegetation is stripped with topsoil and allowed to re-establish on topsoil stockpile to ensure preservation of the seedbank. When mining ceases, the road will be ripped and reseeded to re-establish vegetation (see Appendix I).	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. A total strip is conducted by the mine meaning that all vegetation is stripped along with the topsoil. As described, no topsoil stockpiling is currently being conducted by the mine, with live placement of all topsoil as stripped. Some old topsoil dumps are located on the mine and will be utilised during the future mine rehabilitation activities.
20.4	Dust suppression by wetting down of the unsealed roads.	Compliant	Dust suppression was undertaken on gravel routes.
20.5	Regular maintenance of equipment.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is used for planned maintenance on equipment.
20.6	Drains will be constructed as v-cut drains immediately adjacent to the road margin. Cut-off drains direct clean runoff into drainage systems (trenches or berms along highwall access roads) and away from polluted areas. Polluted runoff is directed into pollution control dams in a similar manner.	Compliant	As described in Section 19.5 above, it was explained that a series of cut-off trenches and berms were constructed to prevent contaminated surface water runoff from entering the open pit and ramp areas as well as to isolate the clean water management system from the dirty water management system. Refer also to the findings as presented in Section 19.5 above.
20.7	Water cannons and sprayers are installed on the pit walls control dust generation. PM10 monitors have been installed.	Compliant	As described in Section 13.2, the mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion. As described in Section 17.2, dust suppression is not undertaken on all haul and access roads located in the dirty water management system of the mine. As part of the dust fallout monitoring programme two particulate matter monitoring (Topaz monitors) localities have been implemented and include: <ul style="list-style-type: none"> • Du Plessis Farm; and • Bokgoni Mag. Refer also to the findings as presented Section 13.2.
20.8	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
20.9	Regular maintenance of the dragline ensures that it is more energy efficient.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
20.10		Compliant	Spoils are profiled (in accordance with the rehabilitation designs) and covered with subsoil and topsoiled as

Condition number	Condition	Finding	Observation/ Audit Evidence
	Profile dragline placed spoils and place pre- stripped subsoil over spoils		part of the concurrent rehabilitation undertaken by the mine. Refer further discussions on rehabilitation designs, the implementation thereof and verification on compliance thereto.
20.11	Water cannons and sprayers are installed on the pit walls control spontaneous combustion. Cladding of burning material with topsoil reduces spontaneous combustion.	Compliant	As described in Section 13.2, the mine operated two water cannons to control spontaneous combustion. The water cannons were moved as mining progressed as well as when required for the management of spontaneous combustion.
22.12	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
22.13	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Compliant	Dust suppression was undertaken on gravel routes.
20.14	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above with regards to the dust fallout monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto.
20.15	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
20.16	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Rehabilitation has already been undertaken as per the sighted annual rehabilitation plan: <i>Annual rehabilitation strategy and implementation plan November 2020, Khwezela Bokgoni Colliery</i> . Shangani Management Services assisted with the financial calculations of the rehabilitation. Refer previous discussions on rehabilitation designs as per Section 17.13.
20.17	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Compliant	As described above in Section 14.5, monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine (refer also to previous discussions in this regard). The mine has also appointed an external contractor 'Blast Management and Consulting' to conduct monthly air blast and ground vibration monitoring with proof hereof available.
20.18	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Refer to the findings and discussions as presented Section 20.16.
20.19	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Keep rehabilitation up to date.	Compliant	Dust suppression was undertaken on gravel routes.
20.20	Wear the appropriate PPE including gas masks when necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
20.21	A complaints register exists for the public to comment.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for

Condition number	Condition	Finding	Observation/ Audit Evidence
	Regular meetings with the public and mine take place to discuss issues.		corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
20.22	Wear PPE including earplugs where necessary.	Compliant	Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto identified.
20.23	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Compliant	As described above in Section 14.5, monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine (refer also to previous discussions in this regard). The mine has also appointed an external contractor to conduct monthly air blast and ground vibration monitoring with reports available on record.
20.24	Stabilise soils and minimise erosion. Re- establish soil nutrient cycling. Conduct periodic soil analysis to determine fertilisation requirements for pasture establishment and maintenance (see Appendix I).	Compliant	As described in Section 22.23 below, revegetation is undertaken to act as erosion control. During the seeding process, fertilisation application is undertaken. Mine personnel confirmed that periodic soil analysis to determine fertilisation requirements for pasture establishment and maintenance, is undertaken on previously rehabilitated areas. Reports are available. A rehabilitation monitoring program goal is set for July 2021. The program itself is to be developed by external specialists – a tender is to go out by May 2021.
20.25	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Compliant	Dust suppression was undertaken on gravel routes.
20.26	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above with regards to the dust fallout monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto.
20.27	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
20.28	Wear PPE including earplugs where necessary. Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented.	Compliant	As described in Section 2.4 above, signage is present throughout the mine to indicate the minimum PPE required to undertake activities within each specific area. No noise monitors have been fitted in any areas. Monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine by Gijima Occupation Hygiene and Environmental Services.
20.29	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Compliant	Dust suppression was undertaken on gravel routes.
20.30	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Refer to the findings and discussions as presented Section 20.16.
21. Section: Pit 5 West			
21.1	Prior to compaction, the topsoil is stripped and placed according to the Topsoil Stripping and Placement	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure

Condition number	Condition	Finding	Observation/ Audit Evidence
	procedure.		indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Refer to the findings and recommended actions as presented in Section 13.13 above.
21.2	Vegetation is stripped with topsoil and allowed to re-establish on topsoil stockpile to ensure preservation of the seedbank. When mining ceases, the road will be ripped and reseeded to re-establish vegetation (see Appendix I).	Compliant	As described in Section 13.13 above, KBC has implemented the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. A total strip is conducted by the mine meaning that all vegetation is stripped along with the topsoil. As described, no topsoil stockpiling is currently being conducted by the mine, with live placement of all topsoil as stripped. Some old topsoil dumps are located on the mine and will be utilised during the future mine rehabilitation activities.
21.3	Dust suppression by wetting down of the unsealed roads.	Compliant	Dust suppression was undertaken on gravel routes.
21.4	Regular maintenance of equipment.	Compliant	As per the findings as presented in Section 2.2 above, the SAP system is used for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
21.5	Drains will be constructed as v-cut drains immediately adjacent to the road margin. Cut-off drains direct clean runoff into drainage systems (trenches or berms along highwall access roads) and away from polluted areas. Polluted runoff is directed into pollution control dams in a similar manner.	Compliant	As described in Section 19.5 above, a series of cut-off trenches and berms were constructed to prevent contaminated surface water runoff from entering the open pit and ramp areas as well as to isolate the clean water management system from the dirty water management system. Refer also to the findings as presented in Section 19.5 above.
21.6	Water cannons and sprayers are installed on the pit walls control dust generation. PM10 monitors have been installed.	Not Applicable	Dragline operations were not present nor applicable for Pit 5 Area at the time of the audit.
21.7	Wear the appropriate PPE including gas masks when necessary.	Not Applicable	Dragline operations were not present nor applicable for Pit 5 Area at the time of the audit.
21.8	Regular maintenance of the dragline ensures that it is more energy efficient.	Not Applicable	Dragline operations were not present nor applicable for Pit 5 Area at the time of the audit.
21.9	Profile dragline placed spoils and place pre- stripped subsoil over spoils	Not Applicable	Dragline operations were not present nor applicable for Pit 5 Area at the time of the audit.
21.10	Water cannons and sprayers are installed on the pit walls control spontaneous combustion. Cladding of burning material with topsoil reduces spontaneous combustion.	Not Applicable	Dragline operations were not present nor applicable for Pit 5 Area at the time of the audit.
21.11	Wear the appropriate PPE including gas masks when necessary.	Not Applicable	Dragline operations were not present nor applicable for Pit 5 Area at the time of the audit.

Condition number	Condition	Finding	Observation/ Audit Evidence
21.12	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Compliant	Dust suppression was undertaken on gravel routes.
21.13	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Compliant	Refer to the findings and recommended actions as presented in Section 13.2 above with regards to the dust fallout monitoring conducted at the mine. Refer also to Section 2.4 for a discussion on the PPE requirements for both employees and contractors as well as the compliance thereto.
21.14	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
21.15	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Compliant	Rehabilitation has already been undertaken as per the sighted annual rehabilitation plan: <i>Annual rehabilitation strategy and implementation plan November 2020, Khwezela Bokgoni Colliery</i> . Shangani Management Services assisted with the financial calculations of the rehabilitation.
21.16	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Compliant	As described above in Section 14.5, monthly noise monitoring is conducted on employees undertaking varying activities at various areas of responsibility of the mine (refer also to previous discussions in this regard). The mine has also appointed an external contractor to conduct monthly air blast and ground vibration monitoring and proof hereof was provided in the form of the monthly ground vibration and air blast monitoring reports from January 2018.
21.17	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.18	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Keep rehabilitation up to date.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.19	Wear the appropriate PPE including gas masks when necessary.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.20	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.21	Wear PPE including earplugs where necessary.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.22	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.23	Stabilise soils and minimise erosion. Re- establish soil nutrient cycling. Conduct periodic soil analysis to	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.

Condition number	Condition	Finding	Observation/ Audit Evidence
	determine fertilisation requirements for pasture establishment and maintenance (see Appendix I).		
21.24	Dust on roads is controlled by wetting down the haul roads or applying dusicides to main haul roads.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.25	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.26	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.27	Wear PPE including earplugs where necessary. Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.28	Dust on roads is controlled by wetting down the haul roads or applying dusicides to main haul roads.	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
21.29	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Not Applicable	Pre-stripping operations at Pit 5 West do not apply at the time of the audit.
22. Section: Block 3A North			
22.1	Prior to compaction, the topsoil is stripped and placed according to the Topsoil Stripping and Placement procedure.	Not Applicable	Mining activities stopped in 2012.
22.2	Vegetation is stripped with topsoil and allowed to re-establish on topsoil stockpile to ensure preservation of the seedbank. When mining ceases, the road will be ripped and reseeded to re-establish vegetation (see Appendix I).	Not Applicable	
22.3	Dust suppression by wetting down of the unsealed roads.		
22.4	Regular maintenance of equipment.		
22.5	Drains will be constructed as v-cut drains immediately adjacent to the road margin. Cut-off drains direct clean runoff into drainage systems (trenches or berms along highwall access roads) and away from polluted areas. Polluted runoff is directed into pollution control dams in a similar manner.	Not Applicable	

Condition number	Condition	Finding	Observation/ Audit Evidence
22.6	Water cannons and sprayers are installed on the pit walls control dust generation. PM10 monitors have been installed.	Not Applicable	
22.7	Wear the appropriate PPE including gas masks when necessary.	Not Applicable	
22.8	Regular maintenance of the dragline ensures that it is more energy efficient.	Not Applicable	
22.9	Profile dragline placed spoils and place pre- stripped subsoil over spoils	Not Applicable	
22.10	Water cannons and sprayers are installed on the pit walls control spontaneous combustion. Cladding of burning material with topsoil reduces spontaneous combustion.	Not Applicable	
22.11	Wear the appropriate PPE including gas masks when necessary.	Not Applicable	
22.12	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Applicable	
22.13	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Not Applicable	Mining activities stopped in 2012.
22.14	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Not Applicable	Mining activities stopped in 2012.
22.15	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Not Applicable	Mining activities stopped in 2012.
22.16	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Not Applicable	Mining activities stopped in 2012.
22.17	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free	Not Applicable	Mining activities stopped in 2012.

Condition number	Condition	Finding	Observation/ Audit Evidence
	draining with sufficient slope to accommodate minor settlement (see Appendix I)		
22.18	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Keep rehabilitation up to date.	Not Applicable	Mining activities stopped in 2012.
22.19	Wear the appropriate PPE including gas masks when necessary.	Not Applicable	Mining activities stopped in 2012.
22.20	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Not Applicable	Mining activities stopped in 2012.
22.21	Wear PPE including earplugs where necessary.	Not Applicable	Mining activities stopped in 2012.
22.22	Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented. Maintain machinery regularly.	Not Applicable	Mining activities stopped in 2012.
22.23	Stabilise soils and minimise erosion. Re- establish soil nutrient cycling. Conduct periodic soil analysis to determine fertilisation requirements for pasture establishment and maintenance (see Appendix I).	Not Applicable	Mining activities stopped in 2012.
22.24	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Applicable	Mining activities stopped in 2012.
22.25	KK has a fallout monitoring procedure to monitor any dust fallout from conveying and hauling activities. Employees and contractors wear PPE including gas masks (when necessary) to protect themselves.	Not Applicable	Mining activities stopped in 2012.
22.26	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Not Applicable	Mining activities stopped in 2012.
22.27	Wear PPE including earplugs where necessary. Carry out noise monitoring during the operational phase to ensure that noise mitigation measures have been effectively implemented.	Not Applicable	Mining activities stopped in 2012.
22.28	Dust on roads is controlled by wetting down the haul roads or applying dusticides to main haul roads.	Not Applicable	Mining activities stopped in 2012.
22.29	Restore land to an agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation. Re- profile surface to be free draining with sufficient slope to accommodate minor settlement (see Appendix I)	Not Applicable	Mining activities stopped in 2012.

Condition number	Condition	Finding	Observation/ Audit Evidence
23. Section: Rehabilitation			
23.1	KK has a dragline which is dedicated to rehabilitation of the mined out areas. KK adheres to a topsoil placement procedure to ensure the effective placement of topsoil on profiled reshaped spoils so that it corresponds to the EMPR Land capability commitments. Re- profile dragline-placed spoils and place opencast soils over reshaped spoils in areas where opencast mining is carried out. Ensure the re-profiled land form is in keeping with the adjacent unmined land surface (see Appendix I).	Compliant	<p>KBC has developed the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation.</p> <p>The difference between the topsoil survey points and the pre-strip level 1 is verified by the Truck and Shovel Planner, to confirm that correct stripping is done, with such approach verified during the audit.</p> <p>It was reported that no topsoil stockpiling is currently being done, with live placement of all topsoil as stripped. Some old topsoil dumps are located on the mine, and will be utilised during the future mine rehabilitation activities.</p>
23.2	The dragline is switched off when not in use.	Compliant	Machinery and equipment at the mine are only switched on when operational. When the equipment and machinery is not in use, it is switched off. Such requirements are also contained with the <i>Anglo American Fatal Risk Standard</i> that is included in the onsite induction process.
23.3	KK adheres to a topsoil stripping and placement procedure. Live placement of topsoil occurs. The topsoil is seeded and covered to reduce erosion. KK also adheres to a usable soil management proceeded to ensure correct placement of usable soil to maximise soil recovery and reduce soil loss due to erosion (see Appendix I).	Compliant	<p>KBC has developed the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation.</p> <p>No topsoil stockpiling is currently being done, with live placement of all topsoil as stripped. Some old topsoil dumps are located on the mine, and will be utilised during the future mine rehabilitation activities.</p> <p>On a monthly basis, all rehabilitation is tracked by the survey department, and the Progressive Rehabilitation Plan updated.</p>
23.4	Soils are profiled to allow natural reseeding patterns.	Compliant	Refer to the findings and recommended actions as presented in Section 23.1 above.
23.5	Ensure that weeds and/or invasive species are minimised or eradicated on site. KK have an invasive eradication programme (see Appendix I).	Compliant	The current weeds and/or invasive species management focuses primarily on wattle and blue gum, and the auditors, with reference to the <i>Biodiversity Action Plan</i> also identified other species for eradication.
23.6	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Monthly dust fall out monitoring is conducted to detect air quality impacts so that these impacts can be managed quickly and effectively.	Compliant	Dust suppression was undertaken on gravel routes.
23.7	Wear the correct PPE including face mask to prevent inhalation of dust.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
23.8		Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for

Condition number	Condition	Finding	Observation/ Audit Evidence
	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.		corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required. Annual Farmer's Meetings are also held – the last one being held on 24 October 2019.
23.9	Wear the appropriate PPE including earplugs where necessary.	Compliant	All employees at the mine wear the appropriate PPE as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn as was observed during site observations.
23.10	Minimise the compaction of soil during stockpiling and placement by measuring the correct ripping depth according to the soil and vegetation monitoring procedure.	Compliant	Refer previous discussions under Section 13.13.
23.11	Rehabilitated areas are monitored to identify the occurrence of surface erosion, vegetation die back, salinisation of the soil surface, fertility status of rehabilitated land and the emergence of alien/exotic vegetation. Implement remedial measures as required (see Appendix I).	Compliant	Monitoring of rehabilitated areas is the responsibility of the Rehabilitation Mine Overseer and ACES, during which rehabilitation reports are generated. Vegetation assessments are also done as per sighted report, <i>The use of Landscape Function Analysis (LFA) in combination with scale related vegetation sampling as a monitoring tool for natural and rehabilitated areas of Kleinkopje Colliery, 2016</i> . The report covers vegetation management, cover, structure, key species and invasive species. A further report <i>Kleinkopje Colliery Land Capability Assessment, 2011</i> is also consulted that provides a status of the land capability of KBC. It was reported that a three-year program is to be developed by July 2021. A tender is out for external specialisation.
23.12	Revegetate rehabilitated areas and manage these areas to ensure long term stability. Replace natural vegetation with improved pasture species. Stabilise soil and minimise erosion. Continuously eradicate alien and exotic species. No specific mitigation is required. Fauna will naturally recolonise rehabilitated areas (see Appendix I).	Compliant	An <i>Annual rehabilitation strategy and implementation plan 2020 and Vegetation Monitoring Procedure</i> has been developed and implemented at the mine.
23.13	Ensure topography is free draining. This has been designed for the Life of Mine Plan to make the surface free draining at closure by adhering to the Digital Terrain Model (DTM). Ensure surface water runoff from the rehabilitated area is maximised (see Appendix I). Re-profile dragline-placed spoils and place opencast soils over reshaped spoils in areas where opencast mining is carried out. Ensure the re-profiled land form is in keeping with the adjacent unmined land surface	Compliant	KBC maintains its fleet (dozers, dragline and trucks) and equipment through the preventive maintenance system known as SAP. All contractors to the mine are responsible for the servicing of their own machinery and equipment. Refer to the findings and recommended actions as presented in Section 23.1 above.
23.14	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Maintain machinery to reduce diesel and petrol fumes. Monthly dust fall out monitoring is conducted to detect air quality impacts so that these impacts can be managed quickly and effectively.	Compliant	Refer also to the findings as presented in Section 13.2 above for a detailed description of the air quality and dust fallout monitoring programme.
23.15	Wear the correct PPE including face mask to prevent inhalation of dust.	Compliant	All employees at the mine wear the appropriate PPE including face masks as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.

Condition number	Condition	Finding	Observation/ Audit Evidence
23.16	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required <i>Councillor Ward Forum minutes</i> (2 February 2018), <i>Community Ward Forum minutes</i> (9 March 2018), <i>Community Ward Forum agenda</i> (19 February 2021) and <i>Community Ward Forum agenda and attendance registers</i> (26 March 2021) were provided for review, or as part of the environmental authorisation application processes for new projects.
23.17	Wear the appropriate PPE including earplugs where necessary. Maintain machinery regularly.	Compliant	All employees at the mine wear the appropriate PPE including earplugs as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
23.18	A complaints register exists for the public to comment. Regular meetings with the public and mine take place to discuss issues. Ensure equipment used for rehabilitation is well maintained. Demolition work should be restricted to daylight hours.	Compliant	A complaints register is in place for the mine and complaints are further captured in the Enablon system for corrective and preventive action. Regular stakeholder meetings are held between KBC and the relevant stakeholders where required <i>Councillor Ward Forum minutes</i> (2 February 2018), <i>Community Ward Forum minutes</i> (9 March 2018), <i>Community Ward Forum agenda</i> (19 February 2021) and <i>Community Ward Forum agenda and attendance registers</i> (26 March 2021) were provided for review, or as part of the environmental authorisation application processes for new projects.
23.19	All flammable material is removed from the firebreak once the firebreak has been implemented. If a spill occurs, KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system	Compliant	As per the scope of work for the implementation of fire breaks, it is stipulated that all firebreaks must be clear of all grass cuttings or any other type of fuel. It was reported that the firebreak around the tyre bay is planned to be cleared again by May 2021. A purchase order for the same was verified during the audit (PO number: 4501675126). As described in Section 2.19, KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Refer also to the findings and recommended actions as presented in Section 2.19 above.
23.20 & 23.21	Areas where fire breaks are being implemented are being ploughed perpendicular with flow of water thus creating contours preventing Grass growth after first rains on these areas further prevent erosion.	Compliant	Fire breaks are implemented on an annual basis prior to the dry season and are also ploughed. <i>The Khwezela Colliery firebreak tender Scope of Work</i> document which will be sent out at the start of winter 2021, requires that at least 12 m wide breaks be created and be clear of all grass cuttings and any other type of fuels. This is therefore done by contracted parties outside the mine. The firebreaks cover an area of 300 ha.
	Areas where fire breaks are being implemented are being ploughed perpendicular with flow of water thus creating contours preventing Grass growth after first rains on these areas further prevent erosion.	Compliant	
23.22	Ensure that weeds and/or invasive species are minimised or eradicated on site. KK have an invasive eradication programme (see Appendix I).	Compliant	Refer previous discussions under Section 23.5.
23.23	KK have an alien plants eradication programme running. Eradication of alien and invader species takes	Compliant	Refer previous discussions under Section 23.5.

Condition number	Condition	Finding	Observation/ Audit Evidence
	place by cutting and the use of herbicides (see Appendix I).		
23.24	Soil samples are taken 6 weeks prior to the potential fertilising of the rehabilitated area to determine the nutrient status of the soil as not to over-fertilise and change the pH of the soil (see Appendix I).	Compliant	Soil sampling is not undertaken 6 weeks prior to determine fertilising requirements. KBC applies fertilisation the same for all areas. A vegetation establishment procedure requires that either a 'blanket approach' or actual soil sampling, analyses must be undertaken to develop fertiliser recommendations.
23.25	KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs during rehabilitation, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Refer to the findings and recommended actions as presented in Section 2.19 above.
23.26	KK adheres to a topsoil stripping and placement procedure. Live placement of topsoil occurs. The topsoil is seeded and covered to reduce erosion. KK also adheres to a usable soil management procedure to ensure correct placement of usable soil to maximise soil recovery and reduce soil loss due to erosion (see Appendix I).	Compliant	As described in Section 13.13 above, KBC has developed the <i>Topsoil Management Procedure (AATC016071)</i> that provides for the correct procedure for management of topsoil stripping within the mining cut in order to ensure that the topsoil inventory is maximised for topsoil placement. Although the procedure indicates that the depth of topsoil stripping is determined by the pre-mining soil depth plan, the mine has changed to a standard depth of 3 m (exceeding topsoil depth), to allow for maximising on usable material for rehabilitation. This change in approach is implemented as a measure to address the significant shortfall in available topsoil for rehabilitation. Refer to previous findings and recommended actions regarding live placement of topsoil.
23.27	Minimise the compaction of soil during stockpiling and placement by measuring the correct ripping depth according to the soil and vegetation monitoring procedure (see Appendix I).	Compliant	Refer previous discussions under Section 13.13.
23.28	Practice dust suppression by wetting down haul roads and applying dusticides to main haul roads. Monthly dust fall out monitoring is conducted to detect air quality impacts so that these impacts can be managed quickly and effectively.	Compliant	Dust suppression was undertaken on gravel routes.
23.29	Wear the correct PPE including face mask to prevent inhalation of dust.	Compliant	All employees at the mine wear the appropriate PPE including face masks as required for the specific activity being undertaken. As described above in Section 2.4, signage is also present across the mine's operational areas indicating the required PPE to be worn.
23.30	KK employees adhere to the Spillage clean-up procedure. When a spill/leakage occurs during rehabilitation, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin.	Compliant	KBC has implemented the <i>Khwezela hydrocarbon and chemical handling procedure (AATC026497)</i> . The procedure provides detail on the actions to be taken in the event of a spillage. In the event of a spill, the activity is ceased immediately, the spill kit material / saw dust is placed on the spill and allowed to absorb. An employee then mixes the saw dust with the spilled material after which the contaminated material is collected with a broom and a shovel, placed in a plastic bag and disposed of into the hazardous waste material bin / skip (red bin/skip) located at the workshop. The spillage is also to be reported to the environmental department and logged as an incident on the Enablon system. Refer to the findings and recommended actions as presented in Section 2.19 above.

Condition number	Condition	Finding	Observation/ Audit Evidence
23.31	After top soiling, all rehabilitated land is limed, fertilised and seeded with improved pasture grasses. These species provide a good vegetal cover that binds the soils and prevents soils losses by wind and/or storm water erosion (see Appendix I).	Compliant	Monitoring of rehabilitated areas is the responsibility of the Rehabilitation Mine Overseer and ACES, during which rehabilitation reports are generated. Vegetation assessments are also done as per sighted report, <i>The use of Landscape Function Analysis (LFA) in combination with scale related vegetation sampling as a monitoring tool for natural and rehabilitated areas of Kleinkopje Colliery, 2016</i> . The report covers vegetation management, cover, structure, key species and invasive species. A further report <i>Kleinkopje Colliery Land Capability Assessment, 2011</i> is also consulted that provides a status of the land capability of KBC. It was reported that a three-year program is to be developed by July 2021. A tender is out for external specialisation.
23.32	KK have and alien plants eradication programme running. Eradication of alien and invader species takes place by cutting and the use of herbicides (see Appendix I).	Compliant	Refer previous discussions under Section 23.5
23.33	KK have and alien plants eradication programme running. Eradication of alien and invader species takes place by cutting and the use of herbicides (see Appendix I).	Compliant	Refer previous discussions under Section 23.5
23.34	After top soiling, all rehabilitated land is limed, fertilised and seeded with improved pasture grasses. These species provide a good vegetal cover that binds the soils and prevents soils losses by wind and/or storm water erosion (see Appendix I).	Compliant	Refer previous discussions under Section 23.31

7.1.2 Environmental Management Programme – Management Measures for the EWRP

Condition number	Condition	Finding	Observation/ Audit Evidence
1.	Leaks and pipeline failure must be corrected immediately. In order to determine the exact sites of possible leaks the greening up and possible die-back of vegetation may be used. This will limit the area needing to be excavated to source a potential leak, thus minimising the cumulative impact on the soil and vegetation along the pipeline route. Soils must be sampled by an appropriately qualified professional and suitable soil remediation measures taken to ameliorate rehabilitation of the soils that have been contaminated by mine water.	Compliant	Inspection and maintenance of the lines are undertaken by the engineering sections and forms part of the SAP system with records retained.
2.	Leaks and pipeline failure must be corrected immediately. In order to determine the exact sites of possible leaks the greening up and possible die-back of vegetation may be used. This will limit the area needing to be excavated to source a potential leak, thus minimising the cumulative impact on the soil and vegetation along the pipeline route.		

7.1.3 Environmental Management Programme – Management measures for Decommissioning and Closure

Condition number	Condition	Finding	Observation/ Audit Evidence
1. Activity: Rehabilitation of Opencast Areas			
1.1	All ramps and final voids will be infilled and sloped to prevent erosion.	Compliant	Ramps were implemented in 2012 already. Refer previous discussions on rehabilitation designs as per Section 17.13 of Chapter 5.1.1 above.
1.2	Topsoil will be stripped 150m from the highwall which will then be drilled and blasted and made free draining.	Compliant	As per discussions held with KBC personnel, the general guide of 150 m is followed.
1.3	Surfaces will be topsoiled and revegetated. Sufficient soil will be placed to achieve, as far as practicable, areas with grazing potential by placing a minimum of 250 mm of soil	Compliant	Surface topsoiling and revegetation is undertaken (refer previous discussion under Chapter 5.1.1). KBC applies a minimum 300 mm for grazing. The Post Land Capability Plan indicates that a large component of the area will be arable, a portion grazing and further smaller portion (dump) as wilderness.
1.4	All ramps and final voids will be infilled and sloped to prevent erosion.	Compliant	Refer previous discussions on rehabilitation designs as per Section 17.13, Section 22.15 and Section 22.23 of Chapter 5.1.1 above.
1.5	Surfaces will be topsoiled and revegetated. Sufficient soil will be placed to achieve, as far as practicable, areas with grazing potential by placing a minimum of 250 mm of soil	Compliant	According to the <i>Post Land Capability Plan</i> a large component of the area will be arable. Surface topsoiling and revegetation is undertaken (refer previous discussion under Chapter 5.1.1). KBC applies a minimum 300 mm for grazing.

1.6	All ramps and final voids will be infilled and sloped to prevent erosion. Surfaces will be topsoiled and revegetated. Surfaces will be topsoiled and revegetated. Sufficient soil will be placed to achieve, as far as practicable, areas with grazing potential by placing a minimum of 250 mm of soil.	Compliant	
1.7	Revegetate placed topsoil as soon as possible to reduce erosion and wind-blown dust.	Compliant	As per the sighted annual rehabilitation plan: <i>Annual rehabilitation strategy and implementation plan 2020, Khwezela Bokgoni Colliery</i> , rehabilitation within the areas has been conducted. It was also explained that that a new discard facility (Greenside Colliery) is planned to be established on the current disturbed area of 3A North.
1.8	Excess water will be treated in order to discharge into public streams at an acceptable quality.	Compliant	Surface water runoff from the rehabilitated areas will be viewed as clean water for discharge to the public streams. The future long-term water management strategy is for treatment post closure at the EWRP.
1.9	Surface and groundwater qualities, levels and volumes within and leaving the mine area will be monitored at an interval necessary for effective water management to detect whether there are impacts to downstream users so that these can be acted upon/addressed.	Compliant	Refer to the findings as presented in Section 13.10 and Section 13.20 of Chapter 5.1.1 above.
2. Activity: Discard/Waste Dumps			
2.1	In areas where sufficient topsoil is not available (Kleinkopje dump), revegetate with improved pasture species. Cover these areas with borrowed topsoil if this method does not prove to be successful.	Compliant	As indicated by KBC personnel, sufficient topsoil is available to rehabilitate the Klippan Co- disposal Facility. KBC personnel confirmed that there was currently topsoil shortage for the rehabilitation of other areas. The Klippan Co-disposal Facility was identified for reworking as part of the Khanyisa IPP Project whereby the facility will be reworked and provided to an independent power plant proposed as part of the project. The Khanyisa IPP Project had not commenced as yet.
2.2	Revegetate placed topsoil as soon as possible to reduce erosion and wind-blown dust.		
2.3	Dumps and rehabilitated areas will be clad with topsoil and vegetation to promote surface-water runoff.		
2.4	Polluted groundwater will be collected from drains below the Klippan discard dump and channelled to a point where it could be pumped to a neutralisation/treatment plant.	Compliant	It was explained that contaminated seep water from the Klippan Co-Disposal Facility accumulates within the Klippan Toe Seep Dam, where after it is pumped to the 2A Dam for containment, re-use in the process or pumped to the EWRP for treatment. Drainage channels were also constructed around the Klippan Co-Disposal Facility to divert all contaminated surface water runoff to the PRWD where it is then reused in the process or pumped to the 2A Dam for containment.
3. Activity: Rehabilitation and Revegetation			
3.1	Demolished buildings, loading stations, silos, bunkers etc will be removed.	Not Applicable	No demolishing has occurred, as such this will need to be undertaken during the closure phase.
3.2	Areas will be sloped and revegetated to promote surface water runoff.		
3.3	Erosion control over rehabilitated ground will be achieved by ongoing management and maintenance which will be done until the rehabilitated areas are self-sustainable.	Compliant	Refer previous discussions regarding rehabilitation monitoring and maintenance, as provided under the specific areas.

3.4	Dumps will be rehabilitated and revegetated.	Compliant	This is being undertaken in accordance with the annual rehabilitation plan, and as per specific discussions under the relevant sections above.
3.5	Soil will be replaced over the rehabilitated areas and the area will be profiled.		
3.6	Restore land to an agreed standard/agreed land capability by means of appropriate restoration of topography and rehabilitation of topsoil and vegetation.	Compliant	The EMPr commits itself to a <i>Post-mining Land Capability</i> . Adherence to this plan regarding land capability per specific locality is apparently not always practical but the mine ensures that the land capability targets as committed to are met. On a monthly basis, all rehabilitation is tracked by the survey department, and the <i>Progressive Rehabilitation Plan</i> updated. The plan indicates areas seeded, areas topsoiled, areas topsoiled, reshaping backlog and current mining ramp. Areas as fully rehabilitated (seeded) reflect land capability as grazing, arable, wilderness and wetland.
3.7	Monitor rehabilitated areas to identify the occurrence of surface erosion, vegetation die back, salinisation of the soil surface, fertility status of rehabilitated land and the emergence of alien/exotic vegetation. Implement remedial measures as required.	Compliant	Monitoring of rehabilitated areas is the responsibility of the Rehabilitation Mine Overseer and ACES, during which rehabilitation reports are generated. Vegetation assessments are also done as per sighted report, <i>The use of Landscape Function Analysis (LFA) in combination with scale related vegetation sampling as a monitoring tool for natural and rehabilitated areas of Kleinkopje Colliery, 2016</i> . The report covers vegetation management, cover, structure, key species and invasive species. A further report <i>Kleinkopje Colliery Land Capability Assessment, 2011</i> is also consulted that provides a status of the land capability of KBC. It was reported that a three-year program is to be developed by July 2021. A tender is out for external specialization.
3.8	Demolished buildings, loading stations, silos, bunkers etc will be removed	Not Applicable	No demolishing has occurred, as such will be undertaken during the closure phase.
3.9	Areas will be sloped and revegetated to promote surface water runoff	Compliant	Refer various specific sections on rehabilitation as undertaken in accordance with the annual rehabilitation plan.
3.10 & 3.11	Dumps will be rehabilitated and revegetated.	Compliant	This is being undertaken in accordance with the annual rehabilitation plan, and as per specific discussions under the relevant sections.
	Re-establish improved pasture species on areas where mining has ceased and ensure that it becomes self-sustaining.		
3.12	Manage areas of grazing capability by a combination of grazing or mowing to effect defoliation.	Not Applicable	Currently no rehabilitated land is utilised for grazing according to mine staff. Section 3A North is leased to a farmer, but is not currently utilised.
3.13	Monitor areas of arable potential to ensure that soil fertility levels stabilise and that there is a return in crop yield through time	Compliant	Refer discussions under Section 23.11 of Part 6.1.1 above.
3.14	The same measures are to be implemented as that for the operational phase	Compliant	Refer discussions under Part 6.1.1 above.
3.15	Conduct annual inspections of rehabilitated areas for the first five years after rehabilitation	Compliant	Monitoring of rehabilitated areas is the responsibility of the Rehabilitation Mine Overseer and ACES, during which rehabilitation reports are generated. Vegetation assessments are also done as per sighted report, <i>The use of Landscape Function Analysis (LFA) in combination with scale related vegetation sampling as a monitoring tool for natural and rehabilitated areas of Kleinkopje Colliery, 2016</i> . The report covers vegetation management, cover, structure, key species and invasive species. A further report <i>Kleinkopje Colliery Land Capability Assessment, 2011</i> is also consulted that provides a status of the land capability of KBC. It was reported that a three-year program is to be developed by July 2021. A tender is out for external specialization.
4. Activity: Water Handling			

4.1	Excess water will be treated in order to discharge into public streams at an acceptable quality. Potable water will be sent to the municipality for use as drinking water.	Compliant	KBC provides mine affected water (source of dewatering and mine affected storm water runoff, via 2A Dam) to the EWRP for treatment. A portion of treated water is discharged to Naauwpoortspruit, a further portion provided to the municipality and surrounding mining operations and a portion bottled for drinking purposes.
4.2	Surface and groundwater qualities, levels and volumes within and leaving the mine area will be monitored at an interval necessary for effective water management and to ensure that the impact to downstream users is minimised	Compliant	Refer to the findings as presented in Section 13.10 and Section 13.20 of Chapter 5.1.1 above.
4.3	Dumps and rehabilitated areas will be clad with topsoil and vegetation to promote surface-water runoff.	Compliant	This is being undertaken in accordance with the annual rehabilitation plan, and as per specific discussions under the relevant sections.
4.4	Polluted groundwater will be collected from drains below the Klippan discard dump and channelled to a point where it could be pumped to a neutralisation/treatment plant.	Compliant	Contaminated seep water from the Klippan Co-Disposal Facility accumulates within the Klippan Toe Seep Dam, where after it is pumped to the 2A Dam for containment, re-use in the process or pumped to the EWRP for treatment. Further, a network of drainage channels was constructed around the Klippan Co-Disposal Facility to divert all contaminated surface water runoff to the PRWD where it is then reused in the process or pumped to the 2A Dam for containment.
4.5	Evaluate water quality at monitoring points for both macro and micro constituents. Review water balances regularly.	Compliant	As previously described in Section 13.10 and Section 13.20 of Chapter 5.1.1 above, surface and groundwater quality and level monitoring are conducted on a monthly basis by the mine and on a quarterly and annual basis by the external contractor (Aquatico), whilst Regen Water cc ensures monthly monitoring and analyses. The last <i>Annual Water Quality Assessment Report January – December 2019</i> compiled by Aquatico as well as more recent quarterly and monthly records show that both macro and micro constituents are analysed for and included in the water monitoring protocol. Furthermore, the mine updates the water balance on a monthly basis.
5. Removal of Infrastructure			
5.1	Fill in sinkholes. Profile pre-stripped areas to facilitate surface water runoff	Compliant	It was described that BB Transport is the preferred contractor to undertake rehabilitation of sinkholes as and when required, with all surveyed sink holes presented on a <i>Subsidence areas plan</i> . KBC has also developed and implemented the <i>Landau stabilising potential sinkhole areas procedure (AATC020584)</i> . The aim of the procedure is to ensure that all potential sinkhole areas are identified, supervised and stabilised safely and effectively so as not to cause harm and jeopardise the safety of employees. The procedure provides the actions and steps to be undertaken in the stabilisation of any sinkholes.
5.2	Dumps will be rehabilitated and revegetated	Compliant	Rehabilitation and revegetation of any dumps is undertaken in accordance with the <i>Annual rehabilitation plan</i> , and as per specific discussions under the relevant sections in Chapter 5.1.1.
5.3	Remove old foundations and ruins of mine houses and plants.	Compliant	Plant and associated infrastructure will only be demolished at closure. Demolishing activities at the Landau Village have commenced, however, the demolishing activities and removal of rubble was still to be completed at the time of the audit.
5.4	Infill areas of subsidence and profile to promote surface water runoff.	Compliant	BB Transport is the preferred contractor to undertake rehabilitation of sinkholes as and when required, with all surveyed sink holes presented on a <i>Subsidence areas plan</i> . Refer also to previous discussions above with regards to the rehabilitation of sinkholes.
5.5	In Area 3, blast and remove large concrete structures. Remove all structures and buildings.	Not Applicable	This commitment applies to Landau 3 is applicable to closure and therefore not yet applicable.
5.6	Re-establish improved pasture species on areas where mining has ceased and ensure that it becomes self-sustaining.	Compliant	This is being undertaken in accordance with the <i>Annual rehabilitation plan</i> , and as per specific discussions under the relevant sections, with further discussions on monitoring as being undertaken under Section 23.11 of Chapter 5.1.1 above.

5.7	Ensure equipment used for rehabilitation is well maintained	Compliant	A SAP system is utilised for planned maintenance on equipment. This system also tracks the progress as well as completion of the maintenance activities.
5.8	Demolition work should be restricted to daylight hours	Not Applicable	This commitment is applicable to closure and therefore not yet applicable.

7.2 PIT 2A EXTENSION ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT, SEPTEMBER 2017

Environmental Component	Condition	Finding	Observation/ Audit Evidence
Geology	The mining activities will be limited to the mining rights boundary area and only to what is required in the mine plan (Mining Works Programme and Life of Mine Plan)	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road has recently been completed. This commitment is not yet applicable.
Topography	Ensure that the Rehabilitation, Decommissioning- and Closure plans that have been compiled in terms of Government Gazette 39425. Government Notice R.1147 dated 2015, is adhered to, kept up to date and submitted to the DMR on an annual basis.	Compliant	The Rehabilitation Strategy and Implementation Plan ("RSIP") for Khwezela Bokgoni Colliery has been updated by Shangoni for 2019/2020 and is adhered to. The Plan is also submitted to the DMR on an annual basis.
	Comply with the measures contained in the Storm Water Management Plan (Annexure E4)	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Final land forms should be free draining with final slopes and elevations blending in with surrounding topography post-closure.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Restore land to the agreed land capability by means of appropriate restoration of topography and rehabilitation	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Implementation of measures indicated in the Free-draining / rehabilitation models and Wetland Mitigation Strategy (once developed).	Not Applicable	The wetland mitigation strategy has not yet been compiled. As no specific timeframes have been given to compile and implement the strategy, a "not applicable" finding is noted.
	Ripping, shaping, and vegetating of haul roads with no beneficial post- closure use and integrating these into the surrounding surface topography.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Should a new Pollution Control Dam be constructed and later on decommissioned, removed and rehabilitated during the Closure Phase: <ul style="list-style-type: none"> Remove all contaminated sediment and dispose as appropriate; Remove liner system; Breach and shape embankments to be free-draining Rip and shape footprint area; Establish vegetation by applying suitable seed mix	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Soil	Ensure compliance with the rehabilitation measures and closure objectives for the Klippan Co-Disposal Facility (as per the approved EMP, 2012 and the Kleinkopje Colliery Rehabilitation, Decommissioning and Closure plans).	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Schedule vegetation clearance and soils stripping to coincide with the dry (low rainfall) season.	Not Applicable	Vegetation clearance and soil stripping for the haul road commenced in the wet (high rainfall) season, Quarter 4 of 2018. It was not possible to limit such activities to the dry season only, as such activities are undertaken in accordance with the approved mine plan, schedule and project progression. The haul road has been completed.
	Strictly limit vegetation clearance and earthworks to the pre-determined development areas as proposed.	Compliant	According to the KBC, vegetation clearance as part of the construction of the haul road was limited to the pre-determined development areas as proposed.
	Implement progressive soil stripping according to the mining schedule to minimise exposure duration.	Compliant	Soil stripping was undertaken in areas where the haul road was being constructed.
	Stockpiles should be re-vegetated as soon as possible.	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. Stripped soil is utilised as berms. This commitment is not yet applicable.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
Soil	Install erosion control measures to divert storm water away from stockpiles e.g. berms, soil traps, hessian curtains.	Not Applicable	Site observations show that soil from the stripped areas was utilised as berms along the haul road to divert storm water to the existing 2A Dam.
	Soil stripping and stockpiling should be carried out according to the land capability map as illustrated in Figures 9 and 10 of Annexure E9; and in accordance with the respective diagnostic horizon sequence, as illustrated in Tables 6 to 11 of Annexure E9, in order to ease of re- instating the soils during rehabilitation.	Not Applicable	Site observations show that the haul road has already been constructed.
	A total of at least seven (7) stockpiles is therefore anticipated for the proposed development, as illustrated in Table 17 of Annexure E9 for the various land capability classes. Stripping is however not deemed necessary for the already extensively disturbed Class VIII Witbank soils.	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. This commitment is not yet applicable.
	Soils with closely similar attributes such as the Clovelly/Hutton and Glencoe soil forms, and Westleigh and Katspruit soil forms can be co- stockpiled.	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. This commitment is not yet applicable.
	Soil erosion from stockpiles should be minimised by providing suitable storm water and cut off measures and/or establishing a temporary vegetation cover on the stockpiles.	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. This commitment is not yet applicable.
	Lightly rip stockpiles to at least 25 cm beneath the surface prior to revegetation, and re-vegetate stockpiles with indigenous grass species as soon as practically possible areas as an erosion control mechanism such that the interval between clearing and revegetation is kept to an absolute minimum in order to limit run-off and to mitigate dust emission	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. This commitment is not yet applicable.
	Re-vegetation may be carried out by manual hand seeding or hydro- seeding according to the Environmental Management Plan (EMP) protocols for the proposed development	Not Applicable	No rehabilitation has yet been implemented as part of the Pit 2A extension project as mining has not yet commenced. This commitment is not yet applicable.
	It is recommended that soil stripping and stockpiling be guided by an independent Environmental Control Officer (ECO) with a sound Soil Science expertise, particularly within the Application Area and haul road.	Not Applicable	No soil stripping and stockpiling have yet commenced as part of the Pit 2A extension project. This commitment is not yet applicable.
	The open pit extension area should preferably be demarcated into subsections within which vegetation clearance and soil stripping can be permitted for the current year according to the mining schedule, as opposed to clearing vegetation and stripping all the soils at once, in order to minimise the exposure duration to various impacts (as discussed in the above sections) during stockpiling, and the cumulative effects thereof. Additional areas can then be cleared and stripped progressively in the following mining year when required.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Vehicular movement should be strictly prohibited over the stockpiles to avoid potentially irreversible compaction	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. Vehicles at KBC are only authorised to utilise pre-determined routes. This commitment is not yet applicable.
	Soils should be tilled to at least 1350 kg/m ³ to improve infiltration as well as crop water and nutrients uptake following rehabilitation where significant compaction of more than 1600 kg/m ³ bulk density is encountered in the topsoil.	Not Applicable	No stockpiles have yet been established as part of the Pit 2A extension project. This commitment is not yet applicable.
	The spill prevention and handling procedure should be implemented in the event of the relevant spillages at the project areas.	Compliant	Spillages at KBC are handled and clean-up is implemented in accordance to the following procedures: <ul style="list-style-type: none"> • <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497).</i> • <i>Khwezela Colliery Incident Reporting and Management Procedure</i>
	The mine's incident reporting procedure will be implemented in terms of reporting the relevant incidents internally and externally (if required).	Compliant	

Environmental Component	Condition	Finding	Observation/ Audit Evidence
			(AATC024959).
Soil	An annual soil contamination assessment should be carried out to monitor soil quality down-gradient of the potentially contaminating facilities e.g. the proposed PCD relative to baseline soil quality prior to the construction of such facilities. This will enable detection of latent soil contamination and facilitate emergency response for remedial action where necessary.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Potentially contaminating facilities have not yet been constructed. This commitment is not yet applicable.
	The project site should be kept in an orderly state at all times. Littering is prohibited.	Compliant	There was no large workforce on site at the time of the audit. No litter in the Pit 2A area was noted during site inspections.
	Suitably covered receptacles must be available at all times and conveniently placed for the disposal of waste. These receptacles will be removed to the central salvage yard before being removed from site and disposed of by a permitted contractor at a licensed site. While being stored on-site, the receptacles should be placed within designated areas on an impermeable surface and must be correctly labelled and/or adequately colour coded.	Not Applicable	No waste receptacles are present on site as the existing facilities (e.g. workshops, offices etc.) will be utilised.
	Hazardous and general waste will be separated at source, with separate waste bins provided in accordance to the waste management procedure Waste Management.	Not Applicable	No hazardous or general waste associated with the Pit 2A extension project has been generated. This commitment is not yet applicable.
	Under no circumstances is waste to be burnt or buried on-site.	Noted	The mine personnel are fully aware of such prohibitions.
	Records of hazardous waste being taken off-site must be kept as evidence.	Not Applicable	Mining activities are yet to commence.
	All leakages, spillages and incidents must be cleaned-up and reported as per the mine's spill handling and environmental incidents procedures.	Not Applicable	Mining activities are yet to commence.
	All general and hazardous waste material will be disposed of at registered waste sites (appropriate to the type of waste as disposed of). Certificates of safe and legal disposal shall be kept on file at the mine.	Not Applicable	Mining activities are yet to commence.
	Documentation (waste manifest) will be maintained detailing the quantity, nature and fate of any regulated waste.	Not Applicable	
	Management and disposal of waste will be in accordance with relevant legislative requirements, including the use of licensed contractors.	Not Applicable	
Land Use and Land Capability Flora	Strip soils according to soil type as illustrated in the land capability map (Figures 9 & 10 and Table 15 in Annexure E9).	Not Applicable	Mining activities are yet to commence.
	The upper 0-20 cm topsoil should be stockpiled separately.	Not Applicable	
	Stockpiles should be re-vegetated as soon as possible.	Not Applicable	
	Interburden material should be stockpiled separately to the classifiable soil material.	Not Applicable	
	Sequentially replace soils in a reversed order such that the diagnostic horizon sequence corresponds to pre-mining condition during the rehabilitation phase	Not Applicable	Mining activities are yet to commence.
	Ensure that the Rehabilitation, Decommissioning- and Closure plans that have been compiled in terms of Government Gazette 39425. Government Notice R.1147 dated 2015, is adhered to, kept up to date and submitted to the DMR on an annual basis.	Not Applicable	Mining activities are yet to commence.
	Implementation of measures indicated in the Free-draining / rehabilitation models and Wetland Mitigation Strategy (once developed).	Not Applicable	Mining activities are yet to commence.
Flora	Post-mining rehabilitation requirements for the haul road: Similar to the open pit extension	Not Applicable	Mining activities are yet to commence.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	area, the identified soils within the proposed haul road should be rehabilitated to mimic the current conditions.		
	Post-mining rehabilitation requirements for the PCD area: The proposed PCD area can be maintained as a wilderness land use, as > 80% of this area comprises of very shallow Mispah/Glenrosa/Dresden soils, observed to have very limited effective soil depth/volume (growth medium) under prevailing conditions. Alternatively, clean soil material of at least 250 mm on average can be imported to rehabilitate these soils to favourable conditions potentially suitable for Grazing land use, as proposed in the existing EMPr and rehabilitation plan for the MRA.	Not Applicable	
	Post-mining rehabilitation requirements for open pit extension area: During the rehabilitation phase, the identified soils within the open pit extension area should be sequentially replaced to mimic the current (pre-mining) conditions, as illustrated on the soil map in Figure 7 and 8 in Annexure E9. This will enable re-establishment of the conditions, as illustrated in the land capability map in Figure 9 and 10 (Annexure E9), which is relatively consistent with the recommendations of the post- mining land capability as included in approved EMPr for the greater mining operation.	Not Applicable	
	Considering that the proposed Pit 2A extension and related activities forms part of the existing Kleinkopje Colliery, it is recommended that this Final Rehabilitation, Decommissioning and Closure Plan be consolidated with the Mine's closure planning documents. It is recommended that the information gained from monitoring be used to update the closure plan information. Specialist studies and monitoring results will provide additional information in understanding the full extent of the residual and latent impacts results will provide additional information in understanding the full extent of the residual and latent impacts.	Not Applicable	The RSIP completed by Shangoni dated 2020 is consolidated with the mine's closure planning documents.
	Minimise the footprint as far as possible to mitigate impacts associated with the clearance of existing vegetation.	Not Applicable	Site observations showed that the vegetation clearance as part of the construction of the haul road is limited to the pre-determined development areas as proposed. Major earthworks have not yet commenced.
	Keep clean and dirty water systems separate and ensure that dirty water is not discharged into the environment to avoid impact occurring to flora species.	Not Applicable	Clean and dirty water systems associated with the Pit 2A extension project have not yet been constructed. This commitment is not yet applicable.
	Implement the relevant measures contained in the mine wide Biodiversity Action Plan (BAP) (Annexure E1).	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Implementing adequate erosion control through slope stabilisation and proper vegetation.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	The mine to conduct regular ecological evaluations of the project sites during Construction (clearance) activities and during the Operational and Decommissioning Phase, to monitor and identify potential impacts on biodiversity.	Noted	No evidence is available to confirm that ecological evaluations have been conducted in the area associated with the Pit 2A Extension project (albeit the only construction has been the haul road) and during the clearing activities associated with the development of the haul road. Discussions with mine representatives reveal that the operations (mining) is under "Care & Maintenance phase".
	Ensure that the Rehabilitation, Decommissioning- and Closure plans that have been	Compliant	A rehabilitation, decommissioning and mine closure plan compiled by Shangoni

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	compiled in terms of Government Gazette 39425. Government Notice R.1147 dated 2015, is adhered to, kept up to date and submitted to the DMR on an annual basis.		Management Services and submitted in March 2019. A 2020 RSIP was completed by Shangoni in October 2020.
Flora	An alien vegetation management plan should be compiled by an ECO already during the construction/operational phase and should be kept in place for several years following rehabilitation (minimum of ten years). All species of alien invasive vegetation should be controlled and removed from site. No spread of alien vegetation into any wetlands or adjacent properties should be allowed. Removal of alien species should not be considered a once-off activity, but should include follow-up treatments until successful control/eradication has been achieved.	Compliant	KBC have developed an alien and invasive species management plan as included within the <i>Biodiversity Action Plan for Kleinkopje Colliery</i> , dated February 2014. The current weeds and/or invasive species management focuses primarily on wattle and blue gum, and the auditors, with reference to the Biodiversity Action Plan also identified other species for eradication.
Fauna	Minimise the footprint as far as possible to mitigate impacts associated with the clearance of existing vegetation	Compliant	It was reported that vegetation clearance as part of the construction of the haul road was limited. Major earthworks have not yet commenced.
	Keep clean and dirty water systems separate and ensure that dirty water is not discharged into the environment to avoid impact occurring to fauna specie	Not Applicable	Clean and dirty water systems associated with the Pit 2A extension project have not yet been constructed. This commitment is not yet applicable.
	All linear infrastructure to include “ecological crossing” areas where possible, this is a passage where animals can safely cross structures (roads, pipelines, conveyors etc.).	Not Applicable	Linear infrastructure associated with the Pit 2A extension project has not yet been constructed. This commitment is not yet applicable.
	Restore corridors by removing agriculture land/alien vegetation between natural areas.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Remove mining infrastructure as rehabilitation progresses, so as to not promote fragmentation.	Not Applicable	No rehabilitation has yet been implemented as part of the Pit 2A extension project as mining has not yet commenced. This commitment is not yet applicable.
	Dust suppression of gravel roads (water tankers) should take place.	Compliant	The haul road associated with the Pit 2A extension project was completed in 2020. Dust suppression was undertaken on gravel routes.
	Noise generation must be kept to the minimum possible levels.	Compliant	No noise complaints were received during the audit review period.
	Blasting should be restricted to daylight hours when nocturnal animals are not foraging.	Not Applicable	Blasting associated with the Pit 2A extension project has not yet commenced. This commitment is not yet applicable.
	Traffic: Toad fences and amphibian underpasses (pipes under road) inlaid at regular intervals will allow safe passage across the roads (especially important for roads in close proximity to wetlands/ponds/streams). The use of large underpasses or culverts will also allow safe passage of large/meso-predators throughout the landscape. Warning signage will have to be erected as well as the speed limit enforced in sensitive. Rumble strips can also be applied for animals such as owls that are active at nights, car headlights will blind them.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Monitoring of small mammals could be implemented to monitor the effects of mine activities on small mammal regimes, which are indicative of environmental health.	Not Applicable	
	Ensure that collisions with man-made structures, particularly power lines, telephone lines, fences, light masts and guide wires are minimised	Not Applicable	
	The mine to conduct regular ecological evaluations of the project sites during Construction (clearance) activities and during the Operational and Decommissioning Phase, to monitor and identify potential impacts on biodiversity.	Noted	No evidence is available to confirm that ecological evaluations have been conducted in the area associated with the Pit 2A Extension project (albeit the only construction has been the haul road) and during the clearing activities associated with the development of the haul road. Discussions with mine representatives reveal that the operations (mining) is under “Care & Maintenance phase”.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	Ensure that the Rehabilitation plan and Decommissioning- and Closure Plans that have been compiled in terms of Government Gazette 39425. Government Notice R.1147 dated 2015, is kept up to date and submitted to the DMR on an annual basis.	Compliant	A rehabilitation, decommissioning and mine closure plan compiled by Shangoni Management Services and submitted in March 2019. A 2020 RSIP was completed by Shangoni in October 2020.
Surface Water	Develop and implement a maintenance schedule on the proposed haul road to ensure effective drainage and controlled conveyance towards the adjacent clean water areas.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road has commenced. This commitment is not yet applicable.
	Investigations should be conducted to install silt traps along the discharge areas of the haul road where needed		
	Haul roads should have berms alongside to channel runoff towards controlled discharge areas.	Compliant	Construction of the haul road was recently completed. Site observations showed that berms have been established along the haul roads.
	Investigations should take place to install collection drains at concentration points in order to re-use water in the circuit. These collection drains will be suited in low laying areas of the haul roads.	Compliant	Although no specific drains have been constructed, storm water runoff from the haul roads are contained within the berms. Water runoff would drain towards the pit or the 2A Dam.
	Implement wetland mitigation strategy on completion of mining activities and once haul road has been removed.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	It is recommended to implement a maintenance schedule to ensure regular servicing takes place on the affected water channels, trenches and containment facilities to ensure design capacity.	Not Applicable	The construction of affected water channels, trenches and containment facilities has not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Regular servicing of the silt traps should take place to limit the amount of silt entering the plant return water dams.	Not Applicable	The construction of silt traps has not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	The plant return water dams should be maintained to ensure sufficient freeboard in order to limit any possible overflow or spillages.	Compliant	The Plant Return Water Dam is maintained with a sufficient freeboard. During the audit, it was being desilted.
	Implement the Storm Water Management Plan in Annexure E4.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road was completed. This commitment is not yet applicable.
	Implement a maintenance schedule to ensure the integrity of the Ramp 7 trench and the Ramp 7 sump.	Compliant	Maintenance of the Ramp 7 trench and the Ramp 7 sump is undertaken, tracked and actioned on the system known as Enablon.
	A level control system should be investigated to eliminate any possible overflow towards the Olifants River located downstream of the sump.	Compliant	Ongoing inspections of the sump are conducted. The long term strategy is to modify the Ramp 7 trench to become a clean water trench.
	Ensure that the haul road berm downstream of the sump is maintained at all times as the structure functions as an additional measure to prevent any overflow from reaching the Olifants River.	Compliant	The haul road berm is maintained and its integrity was evident during site observations. It was noted however that Ramp 7 had overflows in December of 2019. This incident was reported to the DWS on 23 December 2019 – the Department acknowledged receipt of the letter on 9 January 2020 and was verified during the previous audit.
	Surface water will be diverted away from mining operations within the 2A mining area as far as practicable in an attempt to lower dewatering requirements from the voids. Unfortunately, there are areas where the diversion of surface water runoff will be difficult to achieve, especially within the ramps leading towards the voids where mining takes place. Surface runoff that accumulates in these areas as a result of rainfall, and groundwater ingress will then need to be dewatered from the voids to ensure the safe continuation of mining activities.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road has commenced. This commitment is not yet applicable.
	Implement the Storm Water Management Plan in Annexure E4	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road has commenced. This commitment is not yet applicable.
	The proposed construction of a new haul road along the western and northern perimeter of the 2A extension area will act as a barrier to prevent any ingress of clean surface	Compliant	The haul road has been constructed. Site observations showed that berms have been put in place.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	runoff into the mine workings. It is important to conduct regular inspections on the haul road's berms to ensure the integrity of the berms.		
	All mine affected water contained in the plant pollution control dams should be re-used in the system, and the maximum daily authorised amount pumped to the eMalahleni Water Reclamation Plant for treatment.	Compliant	As per the water balance diagram provided by KBC, the mine affected water contained in the Plant Pollution Control Dam is re-used in the system and the where excess mine affected water is available, such is pumped to the eMalahleni Water Reclamation Plant for treatment. Daily volumes are recorded, with records available from both the mine and the EWRP.
Surface Water	Practicable solutions should be investigated to convey upstream clean surface runoff towards the downstream clean water environment. No clean surface runoff should be allowed to enter the current plant pollution control dams that will compromise the integrity of the dams.	Compliant	A recent storm water management plan, <i>Partial update of stormwater management plan and mine water balance</i> by Golder Associates was developed in 2020 and dated 23 February 2021. All clean surface runoff is directed away from the current plant pollution control dams via berms and trenches.
	The current plant return water dams should be managed at empty level to ensure that the maximum design capacity of 90 000 m ³ is available to contain the expected water accumulation during a 1:100-year flood scenario.	Not Applicable	The Plant Return Water Dam is not managed at empty level. It was explained that the Plant Return Water Dam is the main affected water containment facility at KBC and is the main source of process water for re-use, therefore, the Plant Return Water Dam cannot be managed at an empty level. KBC has also applied for a WUL and environmental authorisation for a proposed strategy known as the <i>Post 2A Strategy</i> , whereby affected water within the 2A Dam (to be mined) any other affected water that would have been pumped to 2A Dam, will now be pumped to the 5 Wet Void or the 3A North underground workings. Thereafter, the water will be directly pumped to the EWRP for treatment.
	Sufficient pumping infrastructure should be installed to pump the maximum authorised volume to the eMalahleni Water Reclamation Plant with adequate backup pumps in case of down time.	Compliant	It was explained that sufficient pumping infrastructure is installed to pump the maximum authorised volume to the eMalahleni Water Reclamation Plant. Further thereto, in the event of pump failure and where required, back-up pit diesel pumps are available.
	Regular maintenance should be conducted to ensure that no siltation of the plant return water dams takes place that will compromise the integrity of the dams.	Compliant	Maintenance of the plant return water dams is maintained, tracked and actioned on the system known as SAP. Desilting of the Plant Return Water Dam is taking place.
Groundwater	No construction of any water management measures, such as a new PCD or the haul roads should be undertaken with carbonaceous material.	Compliant	It was reported that construction of the haul road was not with carbonaceous material. As per the approved EMP, the preferred alternative is to utilise the PRWD, rather than construction an additional PCD. Reference to the PCD is not applicable.
	All proposed dams should be lined where practically possible, in an effort to minimise the seepage of poor-quality leachate.	Not Applicable	Construction of the proposed dams has not yet commenced. This commitment is not yet applicable.
	Clean surface water should not come into contact with dirty water or coal bearing material	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Implement traffic rules and train.	Compliant	Mine vehicles (HMTVs and LDVs) and machinery are restricted to predetermined roads, as also indicated by the displayed traffic management plans on site. Vehicles or plant were not noted outside such areas during the audit.
	Implement vehicle maintenance.	Compliant	The maintenance of all vehicles and machinery at KBC, is conducted in accordance with a maintenance schedule (e.g. LDVs serviced every 5 000 km). This maintenance schedule is further maintained, tracked, and actioned on the system known as SAP.
	Install oil collections pan in or under vehicles.	Compliant	Oil containment pans are available on site and used at the workshop and hard park areas.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	Wastage of coal-bearing material outside the allocated dirty water management area during the operational phase should be prevented.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Dirty water should be contained in fit-for-purpose and lined designed facilities, which will limit infiltration of contaminated water to groundwater.	Not Applicable	
	Water retention in the in-pit sump areas should be as minimal as possible to limit the quality related impacts.	Not Applicable	
	Clean surface water should not come into contact with dirty water or coal bearing material.	Not Applicable	
	Dirty water dams should be lined as far as is practical to contain all affected water	Not Applicable	Dirty water dams associated with the Pit 2A extension project have not yet been constructed. This commitment is not yet applicable.
	Integrity of liners should be regularly inspected.	Not Applicable	
	Oil contaminated water should be diverted from the bunded area during rain events to an interception or oil water separation facility.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Ensure that the water management measures at the mining operations are adequately sized according to the specifications in GN704.	Not Applicable	
	Continuous monitoring of groundwater quality through purpose drilled groundwater monitoring boreholes to ensure early detection of negative impacts.	Not Applicable	
	Update groundwater (flow and transport) models when new data becomes available.	Not Applicable	
	Handle and store blasting material according to manufacturing requirements	Not Applicable	No blasting material is being stored on site. This commitment is not yet applicable
	Train staff and implement correct procedures for the handling of blasting material.	Not Applicable	
	Only qualified staff should handle these materials.	Not Applicable	
	Hazardous material should be stored in the correct designated and bunded areas that are specially designed and constructed for that purpose.	Not Applicable	No hazardous material is being stored on site. This commitment is not yet applicable.
	Staff should be trained to implement correct procedures for the handling of hazardous material.	Compliant	All employees are required to undertake mandatory training and induction prior to the commencement of work at KBC. On-the-job training is also provided to employees to undertake specific tasks. Training records are available at KBC.
	Implement and maintain proper stormwater management infrastructure.	Not Applicable	Storm water management infrastructure associated with the Pit 2A extension project has not yet been constructed. This commitment is not yet applicable.
	Concurrent rehabilitation should follow the pre-mining in-situ profile with coal spoils and carbonaceous material placed in the bottom beneath the water followed by neutralising rock (sandstone/tillite) and finally a clay and topsoil layer.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Limit infiltration of precipitation into backfilled areas by capping with clay layer and vegetating.	Not Applicable	
	Continuous monitoring of groundwater quality through purpose drilled groundwater monitoring boreholes to ensure early detection of negative impacts.	Not Applicable	
Groundwater	Update groundwater (flow and transport) when new data becomes available.	Not Applicable	
	Waste classification, characterisation and management of mine residue deposits and stockpiles should be undertaken in accordance with the relevant Regulations (GNR 632, GNR 634; GNR 635 and GNR 636) in terms of NEMWA, 2008.	Not Applicable	
	Drains and cut-off trenches (storm water management system) around the proposed opencast pits should be implemented before commencing with pit development to prevent clean run-off water from entering the pit, reducing inflow of clean water into the pit and	Not Applicable	

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	volumes to be dewatered.		
	Interception drainage around the pit – minimize surface area where operations could contaminate water (smaller disturbed areas mean smaller manageable volumes).	Not Applicable	
	Implement and maintain proper stormwater management infrastructure.	Not Applicable	Storm water management infrastructure associated with the Pit 2A extension project has not yet been constructed. This commitment is not yet applicable.
	Continuous monitoring of groundwater quantity/ groundwater levels through purpose drilled groundwater monitoring boreholes to ensure early detection of negative impacts.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Update groundwater (flow and transport) when new data becomes available.	Not Applicable	
	The final cut or pit should be filled to resemble the pre-mining in-situ profiles with the coal spoils and carbonaceous materials (mudstones) in the bottom followed by the higher neutralising potential rocks such as the sandstones and tillites (if present) and finally by a compacted clay and topsoil layer.	Not Applicable	
	Rate and volume of water infiltration should be minimised by compaction and capping.	Not Applicable	
	Coal spoils and carbonaceous material should be placed beneath the water table to limit the ingress of oxidation.	Not Applicable	
	Seeding of landscaped areas to further limit infiltration.	Not Applicable	
	Continuous monitoring of groundwater quality conditions through purpose drilled groundwater monitoring boreholes to ensure early detection of negative impacts.	Not Applicable	
	Review the current Kleinkopje Colliery groundwater monitoring programme and implement measures as per recommendations contained in the Groundwater Risk Assessment Report (Annexure E6). Monitoring boreholes at Kleinkopje Colliery do not cover all potential source areas at present. The monitoring programme should be reviewed so that all sources are covered in terms of monitoring. This monitoring programme should also cover all underground mining compartments where water levels need to be measured to get to an as close as possible volume of water in all mining areas. A geophysical survey needs to be performed to aid in the siting of these new proposed monitoring boreholes. After the monitoring boreholes have been drilled, they need to be pump tested as this will give an estimation of the site specific aquifer parameters. It is recommended that Acid Base Accounting be conducted. The monitoring results should be captured in a suitable database and should be interpreted regularly to gain knowledge from the information.	Compliant	According to mine staff, the current Khwezela Bokgoni Colliery groundwater monitoring programme and the measures as per recommendations contained in the Groundwater Risk Assessment Report has been reviewed and are implemented. A new project to drill new boreholes up to 1 seam has been undertaken and pump testing could not be conducted as these boreholes are dry.
	Present the results to Government on an annual basis to determine compliance with the closure objectives set during the Decommissioning Phase.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Sensitive Landscapes (wetlands)	Avoidance: The loss of wetland habitat could only be avoided if the layout and/or location of the proposed opencast pit was adjusted. The location of the pit is, however, limited by the location of the coal resource, i.e. you can only mine where the coal is located. Adjusting the pit to exclude all wetland areas would render the proposed mining non-feasible. The loss of wetland habitat is thus inevitable if the coal resource is to be mined.	Noted	No specific mitigation measures have been provided.
	The placement of associated surface infrastructures must be carefully planned to	Not Applicable	

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	minimise impact on delineated wetlands. No stockpiles should be placed within the delineated wetland habitat. The following measures should be implemented:		Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	The proposed mining and development footprint must be fenced off and all activities must be limited to the fenced off area.	Compliant	Operational areas at KBC are fenced to prevent unauthorised access, for safety and security purposes. Mining related activities took place within the fenced off area. It was however noted during the site visits that a lot of criminal and vandalism activity was taking place in the mine properties owing to the fact that people are able to enter the mine's properties.
	Locate all temporary stockpiles, constructor's camps, laydown areas, and ablution facilities etc. outside delineated wetland areas and a minimum of 50m from any delineated wetland area.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Develop and implement a construction storm water management plan prior to the commencement of site clearing activities. Such a plan should aim to minimise sediment movement off the construction site and limit increases in turbidity of adjacent wetlands.	Compliant	A recent storm water management plan, <i>Partial update of stormwater management plan and mine water balance</i> by Golder Associates was developed in 2020 and dated 23 February 2021. All clean surface runoff is directed away from the current plant pollution control dams via berms and trenches. As previously described, only the construction of the haul road had commenced and was completed by the time of the audit. As per the storm water management plan the haul road and associated berms are acting as part of the storm water management infrastructure.
	All disturbed areas outside the direct development footprints should be rehabilitated and re-vegetated as soon as possible.	Not Applicable	It was reported that no areas outside of the direct development footprint have been disturbed. This commitment is not yet applicable.
	All construction staff should be educated on the sensitivity of wetland areas and should be made aware of all wetland areas in close proximity to the mining sites.	Compliant	All employees and contractors are required to undertake mandatory training and induction prior to the commencement of work at KBC. On-the-job training is also provided to employees to undertake specific tasks. Training records are available at KBC with examples of completed induction attendance register provided for review.
	If land adjacent to the mining area is leased, the leasee must be made aware of the presence and importance of wetland systems on the leased land, as well as the management measures adopted by the mine for these areas.	Not Applicable	All land adjacent to the proposed Pit 2A extension project area is owned by KBC. This commitment is not relevant.
	Regular cleaning up of the wetland areas should be undertaken to remove litter.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	An alien vegetation management plan should be drawn up by the Environmental Control Officer (ECO) and implemented. Regular removal of invasive alien species should be undertaken. This should extend right through to the decommissioning and closure phase of the project.	Compliant	KBC have developed an alien and invasive species management plan as included within the <i>Biodiversity Action Plan for Kleinkopje Colliery</i> , dated February 2014. The current weeds and/or invasive species management focuses primarily on wattle and blue gum. Later BAP Implementation Plans are dated 8 October 2019 and 30 June 2020.
	A detailed wetland mitigation strategy should be compiled to address the impact of the proposed wetland loss. Such a strategy should quantify the expected wetland loss in terms of hectare equivalents (using the SANBI & DWS 2014 methodology) and should propose measures to compensate for the loss of wetland habitat. Measures should include the rehabilitation and protection of suitable remaining wetlands within the Kleinkopje mining rights area and the reinstatement of a wetland/watercourse across the mined out area to ensure that the rehabilitated mining area, as well as the remaining intact catchment upslope of the mining area, are again connected to downstream water	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. The mine is currently in care and maintenance and expected to resume mining activities when certain economic factors which currently affect viability of the mine improve. Until such time that the situation could change, this commitment is not yet applicable.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	resources, in this case the Olifants River. More detail on such a wetland mitigation strategy is provided in Section 8 of the Wetland Baseline and Mitigation Report (Annexure E3).		
Sensitive Landscapes (wetlands)	A construction storm water management plan must be developed and implemented prior to the commencement of large scale vegetation clearing activities or construction activities and be maintained until the end of the construction phase. Such a plan should aim to minimise the transport of sediment off site as well as prevent the discharge of high velocity flows into downslope wetlands. Sediment traps and sediment barriers should be installed where necessary, and discharge points should be protected against erosion and incorporate energy dissipaters.	Compliant	A recent storm water management plan, <i>Partial update of stormwater management plan and mine water balance</i> by Golder Associates was developed in 2020 and dated 23 February 2021. Refer to previous discussions with regards to the haul road and associated berms acting as storm water management infrastructure.
	Erosion within the construction site must be minimised through the following: Limiting the area of disturbance and vegetation clearing to as small an area as possible; Where possible, undertaking construction during the dry season; Phasing vegetation clearing activities and limiting the time that any one area of bare soil is exposed to erosion; Control of storm water flowing onto and through the site. Where required, storm water from upslope should be diverted around the construction site; Prompt stabilisation and re-vegetation of soils after disturbance and construction activities in an area are complete; and Protection of slopes. Where steeper slopes occur, these should be stabilised using geotextiles or any other suitable product designed for the purpose.	Compliant	Aerial images and site observations show that the area of disturbance and vegetation clearing for the construction of the haul road was limited to as small an area as possible. Construction of the haul road has already been completed.
	Sediment transport off the site must be minimised through the following: <ul style="list-style-type: none"> Establishing perimeter sediment controls. This can be achieved through the installation of sediment fences along downslope verges of the construction site. Where channelled or concentrated flow occurs, reinforced sediment fences or other sediment barriers such as sediment basins should be used (refer to US EPA guidelines on Storm Water Pollution Prevention); Discharge storm water from the construction site (dirty water) into adjacent grassland rather than directly into wetland habitat. Discharged flows must be slow and diffuse; and Regular inspection and maintenance of sediment controls. 	Compliant	Surface water runoff from the construction area (haul road) would report to the 2A Dam or the Pit 2 A North via a network of berms and trenches. No surface water runoff from the construction site is discharged to the clean water environment.
	In addition, ensure that no equipment is washed in/near the streams and wetlands, and if washing facilities are provided, that these are placed no closer than 50m from a wetland or water course.	Compliant	Equipment is not allowed to be washed in/near the streams and wetlands. No wash bays associated with the Pit 2A extension project will be constructed.
	No abstraction of water from the wetlands is allowed unless expressly authorised by the DWS.	Noted	This condition is noted and understood by the mine.
	In order to reduce the potential impacts associated with the introduction of contaminants dissolved or suspended in the runoff from construction sites, where practically possible, no runoff should be introduced into wetlands. Introduction into dryland areas is preferred as the vegetation and soils provide an opportunity to limit the movement of contaminants and the environment is conducive for natural degradation	Compliant	Excavated material has been placed along the haul road area in the form of berms to prevent the introduction of contaminants, dissolved or suspended, in the runoff from construction sites into wetlands.
Sensitive Landscapes (wetlands)	Potential contaminants used and stored on site should be stored and prepared on bunded surfaces to contain spills and leaks. Sufficient spill clean-up material must be kept on site at all times to deal with minor spills. Larger spills should be reported to the Environmental	Not Applicable	No hazardous material is being stored on site. This commitment is not yet applicable.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	Officer and the relevant authorities (DWS) immediately, with specialists appointed to oversee the clean-up operations.		
	Isolate dirty water areas and prevent discharge of dirty water into the environment.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Minimise the extent of the dirty water exclusion areas while ensuring the effective separation of clean and dirty water.	Not Applicable	
	Ensure concurrent rehabilitation measures keep pace with mining activities so that the rehabilitated areas can be reinstated as clean water areas draining towards downslope wetlands	Not Applicable	
	During rehabilitation the opencast pit should be shaped to drain back into the Olifants River via Ramp 7. The remaining intact catchment upslope of the opencast pit should also be incorporated into the design to ensure flows from these areas can also enter the Olifants River	Not Applicable	
	No discharge of dirty water should take place on site.	Not Applicable	
	The overburden stockpiles will contain carbonaceous material and should be considered a dirty water area. No run-off from the overburden stockpile should be discharged to the environment without treatment. Random water quality test should be done to ensure that the water entering the water systems are clean and does not contaminate the top soil stockpiles.	Not Applicable	
	The topsoil stockpiles should be located within a clean water area and no contaminated water should come into contact with the topsoil stockpiles.	Not Applicable	No topsoil stockpiles have been created as part of the Pit 2A extension project. This commitment is not yet applicable.
	Side slopes of the topsoil stockpiles should be kept as low as possible and should be vegetated to minimise sediment loss.	Not Applicable	
	Sediment fences should be installed around the stockpile to prevent transport of sediment and topsoil away from the stockpile. All concentrated runoff from the topsoil stockpile should be conveyed through a sediment trap or similar facility which is regularly cleaned and maintained.	Not Applicable	
	Clean storm water should ideally be conveyed in grassed swales rather than cement lined channels or excavated trenches.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Discharge points into the environment should be protected against erosion and be subjected to regular maintenance	Not Applicable	
	Clean and dirty storm water needs to be separated.	Not Applicable	
	No contaminated water should be allowed to enter the clean storm water system.	Not Applicable	
	No dirty mine or dirty storm water may be released into the wetlands and should be contained and treated on site, or used for dust suppression. Should contaminated water enter the wetlands due to spillages or other unforeseen circumstances a wetland/water quality expert should be consulted regarding implementation of suitable mitigation and/or rehabilitation measures.	Not Applicable	
	The required PCD should be designed to be in compliance with the applicable legislation requirements as well as accepted best management practices.	Not Applicable	As per the approved EMP, the preferred alternative is to utilize the PRWD, rather than construction an additional PCD. This commitment is only applicable to the other alternatives.
	To prevent seepage and leakage out of the PCD, this facility should be lined with a suitable engineered liner.	Not Applicable	In light of the preferred alternative being approved and implemented, this EMP commitment is not applicable.
Sensitive	A water quality and biomonitoring plan should be compiled and implemented (if not	Compliant	Water quality monitoring and biomonitoring is conducted in the downstream water

Environmental Component	Condition	Finding	Observation/ Audit Evidence
Landscapes (wetlands)	already in place) to monitor for any deterioration in water quality in the adjacent wetland systems.		resources (i.e. Tweefonteinspruit and the Olifants River), as confirmed by the following reports: <ul style="list-style-type: none"> - <i>Biomonitoring and Toxicity Assessment of the Tweefonteinspruit, Naauwpoortspruit and Olifants River</i>, dated 15 April 2020 and prepared by Nepid Consultants. - <i>Annual Water Quality Assessment Report January – December 2019</i>, prepared by Aquatico Scientific (a 2020 annual report was not done but monthly and quarterly monitoring is undertaken).
	Regular maintenance and inspections of the PCD should be undertaken to ensure operation of the dam as per design specifications. A log book of inspections and maintenance activities must be kept	Not Applicable	As per the approved EMP, the preferred alternative is to utilize the PRWD, rather than construction of an additional PCD. This commitment is only applicable to the other alternatives.
	It is recommended that rehabilitation of the opencast pit includes the reinstatement of a water course across the opencast pit to drain into the Olifants River via Ramp 7. The entire rehabilitated area should be appropriately shaped to ensure the upslope catchment and the rehabilitated area can drain via the reinstated water course to the Olifants River. Soil cover should be maximised in the rehabilitated area, while slopes should be kept as low as possible while ensuring free- drainage and bearing in mind that ingress into the mined out pits is minimised. The reinstated watercourse should be designed to support wetland habitat with a variety of micro-habitats. This will require a clay liner to prevent ingress of water into the mined out pits as well as various interventions to control flow and prevent erosion and scour. Further recommendations are provided in Section 8 of Annexure E3 (Wetland Baseline and Mitigation Report).	Not Applicable	Mining and rehabilitation activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Wetland re-creation: It is proposed that the pit be rehabilitated to be free-draining, draining towards the Olifants River via Ramp 7 (see Figure 12 in Annexure E3). The biggest risk associated with the proposed approach is the increased ingress of water into the rehabilitated pit, increasing the volumes of water requiring treatment. In order to minimise this risk, it is vital that the re-created watercourse be clay-lined so as to minimise ingress. Further design considerations proposed include: The re-created watercourse should be characterised by gentle side- slopes, especially along the watercourse/wetland boundary to allow for vegetation zonation. The proposed watercourse should include various interventions designed to control flow. The re-created system will be surface water driven (due to the free-draining landscape and lack of interflow) and likely characterised by significant flood flow following heavy rainfall events and the absence of baseflow during extended dry periods. This will make the system susceptible to erosion, unless carefully designed. Interventions should include: Ponds to attenuate flood flows, with gradual release over a number of days; and Erosion control measures, e.g. gabion weirs. These will also assist with trapping sediments; It is proposed that re-creation of the watercourse includes focus on the creation of various	Not Applicable	Mining and rehabilitation activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	micro-habitats, including for example: <ul style="list-style-type: none">Unchannelled sectionsDeeper water areasTemporarily saturated areas		
Sensitive Landscapes (wetlands)	On-site rehabilitation opportunities: A site visit conducted by the wetland specialists to identified pans (as per Annexure E3) revealed a number of opportunities for improving the ecological integrity of pans 1 and 2 through rehabilitation interventions: Removal of alien trees – removal of alien trees from within the hillslope seepage wetlands surrounding the pans and their direct catchments will serve to improve water flow to the pans. Withdrawing cultivation from the hillslope seepage wetlands around the pan. Instating a vegetated buffer zone between cultivated fields and the delineated wetland habitat. Such a buffer will serve to mitigate against impacts associated with diffuse agricultural runoff from the cultivated fields. Closing of trenches – a number of trenches were observed within the hillslope seepage wetlands that intercept and potentially divert flows. Grazing management plan – it is recommended that a grazing management plan be developed for the pans to ensure overutilization of the pans is avoided.	Not Applicable	Mining and rehabilitation activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	All disturbed and transformed areas should be landscaped to approximate the natural landscape profile, but should avoid steep slopes and concentrated run-off;	Not Applicable	
	Compacted soils should be ripped and scarified.		
	The rehabilitated areas should be re-vegetated as soon as possible following completion of the earthworks to minimise erosion.		
	Regular long-term follow up of rehabilitated areas will be required to ensure the successful establishment of vegetation and to survey for any erosion damage on site.		
	Erosion damage should be repaired immediately.		
	The recommendations contained within the specialist vegetation and soils reports should be fully implemented to ensure successful rehabilitation.		
	Sediment traps should be placed in rehabilitated areas to avoid sedimentation.		
	An alien vegetation management plan should be compiled by the ECO already during the construction/operational phase of the project and should be kept in place for several years following rehabilitation (minimum of ten years). All species of alien invasive vegetation should be controlled and removed from site. No spread of alien vegetation into any wetlands or adjacent properties should be allowed. Removal of alien species should not be considered a once-off activity, but should include follow-up treatments until successful control/eradication has been achieved.		
	Sensitive Landscapes (wetlands)	The likelihood of decant, as well as its expected quality, volume, location and timing, should be determined and measures put in place to ensure that no decant or discharge of contaminated water occurs, unless it meets the required water quality standards as set by the DWS. Where these standards are exceeded, contaminated water will need to be treated. In this regard it is recommended that a water treatment plant be established, or to make use of the existing eMalahleni Water Reclamation Plant, and a water management	

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	plan put in place, to keep the water levels within the mined out areas actively managed post- mining to ensure decant is prevented and no contaminated water is discharged into the environment untreated.		
	No contaminated water must be allowed to enter the reinstated watercourse across the rehabilitated opencast pit.	Not Applicable	Mining and rehabilitation activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Air Quality	Phasing of earthmoving activities to reduce source size.	Not Applicable	Earth moving activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Dust suppression in dirty areas in accordance to a dust suppression procedure.	Compliant	The haul road associated with the Pit 2A extension project has been constructed. Dust suppression was undertaken on gravel routes.
	Early vegetation and stabilisation of topsoil stockpile and reduction of the frequency of disturbance.	Not Applicable	No topsoil stockpiles have been created as part of the Pit 2A extension project. This commitment is not yet applicable.
	Speed control will be enforced on all roads.	Compliant	A vehicle tracking system is in place to track the speed of all mine vehicles. The system is connected to GPS, which assigns speed limits (either mine speed limits (internal) or national speed limits (national road network)). Signage as depicted in photographs in this report has been placed around the site warning vehicles and machinery of the speed limits.
	Complaints register must be make available for the recording of complaints relating to dust: Environmental Incidents, Non-conformance and Complaints.	Compliant	KBC has implemented the <i>Khwezela internal and external communication procedure (AATC010220)</i> and the <i>Khwezela Colliery incident reporting and management procedure (AATC024959)</i> in accordance with which all complaints and incidents, at KBC, are managed. It was previously found that a complaint regarding dust and noise was raised by a resident from Duvha Park but recorded in the Social Complaints Register - this should also be recorded in the Environmental Incidents spreadsheet.
	The current dust fallout, PM2.5 and PM10 monitoring plan should continue to be implemented.	Compliant	As per the <i>2020 Annual Air Quality Monitoring Report</i> , dated March 2020 by WSP; PM2.5 and PM10 monitoring is still implemented.
	Greenhouse gas emissions must be managed through effective maintenance of all diesel driven vehicles.	Compliant	The maintenance of all vehicles and machinery at KBC, is conducted in accordance to a maintenance schedule. This maintenance schedule is further maintained, tracked and actioned on the system known as SAP.
	The Highveld Priority Area has been declared national air pollution hotspot in terms of Section 18(1) of the NEM:AQA. By declaring a priority area, authorities recognise that air quality within these areas are generally regarded as being poor, and frequently meet or exceed ambient air quality standards. Kleinkopje Colliery is located in the Highveld Priority Area. This implies that authorities may impose measures on the Kleinkopje Colliery and other mines and industries within this area in order to allow for improvements in the air quality of the region. Measures imposed by authorities should thus be complied with.	Noted	No specific mitigation measures have been provided.
	Continually assess the efficiency of dust mitigation measures.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Spontaneous combustion to be managed according to the Management of Spontaneous Combustion Procedure.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Noise, Air Blast and Ground Vibration	Effective maintenance of the vehicle engines and exhaust systems.	Compliant	The maintenance of all vehicles and machinery at KBC, is conducted in accordance to a maintenance schedule. This maintenance schedule is further maintained, tracked and actioned on the system known as SAP.
	All noise related complaints received will be dealt with through the complaints register	Compliant	KBC has implemented the <i>Khwezela internal and external communication</i>

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	process		<i>procedure (AATC010220) and the Khwezela Colliery incident reporting and management procedure (AATC024959) in accordance with which all complaints and incidents, at KBC, are managed. It was found that no new noise complaints have been reported.</i>
	Continue implementing the current Ground Vibration and Air Blast monitoring programme.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Ensure notification to surrounding landowners and residents regarding blasting events.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	All attempts must be made to ensure all levels are within the limits, as to avoid complaints from the public. All blasting related complaints received will be dealt with through the complaints register process.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Visual Aspects	Keep disturbed areas to a minimum.	Compliant	Vegetation clearance as part of the construction of the haul road was reportedly limited. Aerial imageries confirm the same. Major earthworks have not yet commenced.
	No clearing of land to take place outside the demarcated footprint.	Compliant	Vegetation clearance as part of the construction of the haul road was reportedly limited. Aerial imageries confirm the same. Major earthworks have not yet commenced.
	Maintain the site during operation of the mine. Inoperative equipment and poor housekeeping, in general, creates a poor image of the activity in the eyes of the public.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Employ dust suppression techniques to reduce the visual impact from dust.	Compliant	The haul road associated with the Pit 2A extension project was recently constructed. Dust suppression was undertaken on gravel routes.
	Adhere to the commitments made in the Kleinkopje Colliery rehabilitation plan and wetland mitigation strategy (once developed).	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Protected Areas and Conservation Planning	Implement the Wetland Mitigation Strategy (as proposed in Annexure E3).	Not Applicable	The wetland mitigation strategy has not yet been compiled.
	Implement and adhere to Kleinkopje Colliery's rehabilitation, decommissioning and closure plan.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Keep disturbed areas to a minimum.	Compliant	Vegetation clearance as part of the construction of the haul road was reportedly limited. Aerial imageries and site observations confirm the same. Major earthworks have not yet commenced.
	No clearing of land to take place outside the demarcated footprint.	Compliant	Vegetation clearance as part of the construction of the haul road was reportedly limited. Aerial imageries and site observations confirm the same. Major earthworks have not yet commenced.
	Implement the mitigation and management measures included under the sections above (flora, fauna and Sensitive landscapes).	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
	Proposed PCD be constructed and operated in the location associated with Alternative (Site) 5.	Not Applicable	The construction of the PCD has not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Archaeology (Heritage Resources)	The impacts to Graveyard 01 (GY01) can be mitigated by means of exhumation and relocation. The exhumation of human remains and the relocation of graveyards are regulated by various laws, regulations and administrative procedures. This task is undertaken by forensic archaeologists or by reputed undertakers who are acquainted with all the administrative procedures and relevant legislation that have to be adhered to whenever human remains are exhumed and relocated. This process also includes social consultation with a 60 days statutory notice period for graves older than sixty years. Permission for the exhumation and relocation of human remains have to be obtained from	Not Applicable	Exhumation of graves has not yet taken place as part of the Pit 2A extension project. This commitment is not yet applicable.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	the descendants of the deceased (if known), the National Department of Health, the Provincial Department of Health, the Premier of the Province and the local police.		
	GY02 and GY03: Graveyards that remain unaffected should be managed by Anglo Operations to ensure their future unaffected existence during the construction, operation and decommissioning phases of its mining operations. The following mitigation measures are recommended: Graveyards must be demarcated with fences or with walls and should be fitted with access gates. Regulated visitor hours should be implemented that is compatible with mine safety rules. This will not be necessary when graveyards are located next to national roads. Corridors of at least 20m should be maintained between graveyard's fences and any developmental components such as roads or other infrastructure that may be developed in the future. Graveyard should be inspected every three months. Inspections should be noted in an inspection register. The register should outline the state of the graveyards during each inspection. Reports on damages to any of the graves or to the graveyards (fences, walls, gates) should be followed with the necessary maintenance work. Maintenance work should be recorded in the inspection register. Graveyards should be kept tidy from any invader weeds and any other refuse.	Compliant	It is reported that unaffected graveyards are managed by KBC. The graveyards are demarcated with fencing and family members of the deceased are allowed to visit the graves. Family members are escorted by the mine security services. A 20 m buffer between the graveyard fences and mine infrastructure is in place. Graveyards are monitored monthly.
	General: In the event that any other sites of cultural and archaeological importance are uncovered during the undertaking of mining and mining related activities, that the activity within the vicinity of the discovery is ceased, the relevant authority notified and suitable qualified specialists appointed to assess the discovery.	Compliant	According to mine personnel, all work is ceased when sites of cultural and archaeological importance are uncovered and SAHRA is contacted to conduct the necessary investigations.
Palaeontology	It is recommended that a member of staff (e.g., the Environment Officer) of the Kleinkopje Colliery be trained to recognise the types of fossils that may be exposed via the mining operations and how to excavate and curate them. This officer should: Make regular inspections of newly exposed rock material following blasting to identify if scientifically significant fossils have been exposed. An experience Karoo palaeobotanist must be mandated by the colliery to inspect the fossils, ascertain their significance and to make any necessary recommendations concerning their preservation. Should scientifically significant macrofossil materials be unearthed during the excavations associated with the project the excavations in that area should be halted in that location and SAHRA informed of the discovery and a palaeontologist contracted to evaluate their importance. A significant potential benefit of the examination of the excavations associated with the construction of the project is that currently unobservable fossils may be uncovered and that potentially significant fossil material may be made available for scientific study.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.
Palaeontology	It is further recommended that: Six monthly examinations of the colliery pit by an experience Karoo palaeobotanist should be undertaken once mining has commenced. The six monthly periodicity of these inspections should be subject to later review, based on the results of those inspections. Should scientifically significant macrofossil materials be unearthed during the excavations	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.

Environmental Component	Condition	Finding	Observation/ Audit Evidence
	associated with the project the excavations in that area should be halted in that location and SAHRA informed of the discovery and a palaeontologist contracted to evaluate their importance. Should scientifically or culturally significant fossil material exist within the project area any negative impact upon it could be mitigated by its excavation (under permit from SAHRA) by a palaeontologist and the resultant material being lodged with an appropriately permitted institution. In the event that an excavation is impossible or inappropriate the fossil or fossil locality should be protected and the fossil site excluded from any further construction activities.		
	Conditions as per SAHRA's final comment received: A letter of agreement for biannual monitoring for the Pit 2A area by a suitably qualified palaeo-botanist and the developer should be submitted to the case on SAHRIS. A NHRA section 36 permit is required for the relocation of the 5 graves located at site GY01, please contact the SAHRA BGG Unit (Mimi Seetelo 012 320 8490) for further information.	Not Applicable	
	Conditions as per SAHRA's final comment received: If any newly discovered heritage resources during construction and operation phases of the proposed development, prove to be of archaeological or palaeontological significance a Phase 2 rescue operation might be necessary, and a permit will be needed before mitigation is carried out. You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/John Gribble 021 202 8652). A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer.	Not Applicable	
	The various plans and programmes as contained in the SLP should continue to be implemented.	Not Applicable	
Socio-economic Aspects	Stakeholders and affected parties should continue to be kept informed of activities at Kleinkopje's Pit 2A mining area	Compliant	Continuous engagement with surrounding landowners is reportedly undertaken. Such engagements include: future forum, detailed blast notifications and public participation processes as part of any new projects at KBC. Such continued engagement is also conducted with stakeholders and local and regional authorities as part of the Future Forum led by the KBC Social Department.
	Proactive engagement with local and environmental authorities to should continue to be undertaken.		
	A complaints register will be made available at the mine security offices for I&APs and stakeholders to voice their concerns and raise any complaints. All complaints received will be recorded and kept on record along with: The manner in which they were received. Time and date of complaint. The I&APs details. All correspondence with the complainant. The manner in which and the date the complaint was dealt with.	Compliant	Complaints registers are made available at the mine security offices. All complaints are logged and tracked on Enablon. Recording on the Enablon system requires that the time and date of the complaint be logged, the I&APs details are captured, all correspondence with the complainant is logged and the manner in which the complaint and the date on which the complaint was dealt with, is logged.
	Strict access control will continue to be implemented at the mine. Warning signs will also be placed around the site to warn the public of the dangers associated with the activities.	Compliant	Anglo's collieries have strict access control measures. All employees are required to clock in, and visitors are required to sign in at the security check point. Warning signs are placed throughout KBC warning the public of the dangers associated with the activities. It was however noted that people gain access into the mine

Environmental Component	Condition	Finding	Observation/ Audit Evidence
			properties for illegal activities (vandalism, theft and poaching) take place due to there being limited movement of Anglo Operation personnel on site as a result of the mine being placed under care and maintenance. Therefore access control is compromised to some degree. However, KBC has in place a number of reasonable measures to control access including those mentioned above and security guards at the entrance points and patrolling the mine especially at night when the illegal activities normally take place.
	Employees and contractors at the mine will receive environmental training on all relevant aspects of the operation and the environment that is, or could be, affected.	Compliant	All employees are required to undertake mandatory training and induction prior to the commencement of work at KBC. On-the-job training is also provided to employees to undertake specific tasks. Training records are available at KBC with examples of completed induction attendance register shared during the audit.
	As per the SLP Progress Report (2015), where retrenchments or closure of the operation is imminent, the mine would put in place the following process to ameliorate the social and economic impact on individuals, regions and economies: <ul style="list-style-type: none"> Assessment/counselling services for affected employees Comprehensive self-employment training programmes Comprehensive training (non-mining skills) and re-employment programmes Creation of jobs for local economies Regeneration of local economies Accessing the Social Plan Fund 	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This commitment is not yet applicable.

7.3 LANDAU III ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL PROGRAMME REPORT, DECEMBER 2017

7.3.1 Construction Phase

Condition number	Condition	Finding	Observation/ Audit Evidence
C.2	The linear footprint of the proposed haul road servitude should be clearly demarcated to restrict vegetation clearing activities within the infrastructure footprint as far as practically possible.	Compliant	Photographic images confirmed that all haul roads have been clearly demarcated and no vegetation clearing has taken place outside the infrastructure footprint.
	Vegetation clearance and commencement of construction activities can be scheduled to coincide with low rainfall conditions when the erosive stormwater and wind are anticipated to be low.	Compliant	It was reported that reclamation of the Landau III MRD has commenced. It was confirmed by mine personnel that the clearance of vegetation and construction commenced 5 March 2018 at the end of the high rainfall season in the Mpumalanga Province. The contractor was Jess Construction.
	Stockpile topsoil from MRD during the development of the ramp for use during the rehabilitation phase. The topsoil stockpile can be used to create a physical barrier towards the nearby water resources.	Compliant	It was explained that topsoil from the Landau III MRD has been stockpiled for use during the rehabilitation phase in an area between the Landau III MRD and the Landau Hostel Waste Water Treatment Works. The topsoil stockpile area has been placed in an area that will not be disturbed during the operational phase. The topsoil stockpile is not located within 50 m of any watercourses. The topsoil stockpile will be used to create berms for the separation of clean and dirty water.
	A regulated speed limit of ≤ 40 km per hour can be maintained to minimise dust	Compliant	A vehicle tracking system known as Trysome is in place to track the speed of all

Condition number	Condition	Finding	Observation/ Audit Evidence
	generation during the construction activities.		mine vehicles. The system is connected to a GPS that assigns speed limits (either mine speed limits (internal) or national speed limits (national road network)). The information gathered from each vehicle is then stored on a central database whereby data can be pulled to assess each vehicles conformance. One such sample record of 23 July 2020 was verified during the audit.
	Bare soils can be regularly dampened with water to suppress dust during the construction phase, especially when strong wind conditions are predicted according to the local weather forecast. This can form part of overall dust suppression.	Compliant	Although construction activities have ceased, dust suppression measures were being implemented at the Landau III MRD access roads. Two water bowser trucks were utilised.
	All disturbed areas adjacent to the haul roads can be revegetated with an indigenous grass mix to re-establish a protective cover, in order to minimize soil erosion and dust emission.	Compliant	Construction activities are completed, and it was seen with photographic evidence that the disturbed areas adjacent to the haul roads have been revegetated.
	Upgrade stormwater management around the MRD (concrete lining of existing trenches, construction of sump) at the start of the construction phase.	Compliant	Clean and dirty water trenches and infrastructure were constructed as part of the reclamation of the Landau III MRD as per previous photographic evidence shared.
C.3	Care should be taken during the stripping of topsoil from the MRD to prevent contamination of topsoil with carbonaceous material.	Compliant	Discussions with mine personnel confirmed that topsoil will be used for the construction of berms. The contaminated layer of topsoil was being stockpiled at the top of the Landau III MRD until such time that KBC can locate a place to store this material.
	Topsoil should be stockpiled at a suitable area to prevent contamination during the operational phase.	Compliant	Refer to discussion under Section C.2 above for a discussion regarding the stockpiling of topsoil.
	Vehicles to be serviced at a dedicated workshop in a bunded area to prevent spillage and contamination with hydrocarbons.	Compliant	All vehicles are being serviced at the central garage. A hard park was constructed, as part of the reclamation of the MRD. Workshops where vehicles are serviced was also established.
	Develop a leak/spill procedure for all possible areas of leaks/spillages.	Compliant	KBC has developed and implemented procedures guiding the management of spillages associated with hydrocarbons. This was further confirmed through the citing of the following document: <ul style="list-style-type: none"> • <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497).</i>
	Spill kits will be provided for on site for spill clearing.	Compliant	Spill kits are available, where relevant to the reclamation of the Landau III MRD Project. There are four spill kits at the Workshop, whilst one is placed at the Screening Area.
	Spills will be cleared and remediated immediately as per the mine's oil management procedure.	Compliant	Discussions with mine personnel confirmed that in the event of a spill incident, spills are cleared and remediated as per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497).</i>
C.4	No vegetation clearance should be undertaken prior to periods of inactivity, and progressively clear the required areas in subsections.	Not Applicable	Construction activities have been completed.
	Aim to conduct all construction activities during the dry season to minimise erosion, which could impact negatively on the land capability.	Compliant	Reclamation of the Landau III MRD has commenced. It was confirmed by mine personnel that the clearance of vegetation and construction commenced 5 March 2018 at the end of the high rainfall season in the Mpumalanga Province.
C.5	Demarcate the laydown and new roads between the laydown area and MRD and ensure	Compliant	Photographic evidence was shared of the laydown areas and new roads that

Condition number	Condition	Finding	Observation/ Audit Evidence
	that all construction activities remain within these footprints.		were demarcated.
	Culverts must be used when the proposed road alignment crosses a wetland as to ensure connectivity of the wetland and faunal species can still use the wetland as a corridor.	Compliant	A photograph was previously shared showing the one culvert constructed as part of the haul road.
	Restrict vehicles to travelling only on designated roadways to limit the ecological footprint of the proposed development.	Compliant	Mine vehicles (HMs and LDVs) and machinery are restricted to predetermined roads.
	A follow up floral survey should be undertaken prior to any disturbance taking place. The proposed construction footprint and the immediate surroundings should be surveyed and any floral SCC identified (as per the Biodiversity report in Appendix 5-2) should be rescued and relocated by a suitably qualified specialist.	Compliant	According to mine personnel a follow up floral survey was undertaken by Jurie Human on 20 February 2018 prior to any disturbance taking place. A <i>Landau 3 MRD Infrastructure area assessment</i> serves as proof thereof.
	All necessary permits for rescue and relocation must be applied for from the MTPA. Plant species requiring permits are included in the Biodiversity report (Appendix 5-2).	Not Applicable	No flora requiring permits for rescue and relocation was identified in the assessment conducted by Scientific Terrestrial Services (dated December 2017).
	Prohibit the collection of plant material by construction personnel for medicinal purposes.	Compliant	Plants are restricted from being collected by any construction personnel. This is also further explained in the environmental awareness and training that is provided to the construction personnel and workers in induction training where a biodiversity land management slide is shared, and rules concerning keeping within walkways.
	Culverts must be used when the proposed road alignment crosses a wetland as to ensure connectivity of the wetland and faunal species can still use the wetland as a corridor.	Compliant	Refer to condition C5 above.
C.6	The required development footprints for the laydown area, hard park and blending area must be demarcated in the field prior to the commencement of any vegetation clearing activity. All construction activity must be limited to the demarcated and authorised disturbance footprints.	Compliant	The Haul Road construction activities have been completed. Construction areas and areas of site clearance were demarcated with either survey pegs, fences or construction nets as shown in previous ECO reports available on record.
	All construction staff should be educated on the importance and sensitivity of the wetland systems on site. This should form part of the induction process.	Compliant	The importance and sensitivity of the wetland systems on site was communicated as part of the environmental awareness and training provided to the contractors / construction staff of the Haul Road. The 'Biodiversity and Land Management' slide addresses this.
	Develop and implement a construction stormwater management plan prior to the commencement of site clearing activities.	Compliant	A storm water management plan was compiled prior to commencement of site clearing activities by Semane Consulting Engineers (Pty) Ltd approved on 13 May 2017. Clean and dirty water trenches, storm water culverts and the dirty water sump were constructed integral to the Haul Road.
	No stockpiling of material may take place within the wetland areas and temporary construction camps and infrastructure should also be located away from these areas, with a minimum buffer of 30m maintained from delineated wetland boundaries.	Compliant	It was noted during the audit that wetland soils were stockpiled within a wetland adjacent to the silt trap but has reportedly since been removed.
	Rehabilitate and re-vegetate all disturbed areas as soon as possible following disturbance	Compliant	Photographic evidence suggests that rehabilitation and re-vegetation activities have commenced as construction of the Haul Road was completed.

Condition number	Condition	Finding	Observation/ Audit Evidence
	An alien vegetation management plan should be developed and implemented. Regular removal of invasive alien species should be undertaken. This should extend right through to the decommissioning and closure phase of the project.	Compliant	KBC have developed an alien and invasive species management plan as included within the <i>Biodiversity Action Plan for Khwezela Colliery</i> . This plan was being updated at the time of the audit to include the whole of Khwezela colliery. The weeds and/or invasive species management focused primarily on wattle and blue gum and such species had been eradicated to some extent by the time of the audit.
	Ensure that no equipment is washed in the streams and wetlands of the area, and if washing facilities are provided, that these are placed no closer than 50m from a wetland or water course. No abstraction of water from the wetlands or dams should be allowed unless expressly authorized in an IWULA.	Compliant	A wash bay had been constructed and further than 50 m away from a wetland or water course. No abstraction of water from the wetlands or dams is taking place.
	Potential contaminants used and stored on site should be stored and prepared on bunded surfaces to contain spills and leaks. Sufficient spill clean-up material must be kept on site at all times to deal with minor spills. Larger spills should be reported to the Environmental Co-ordinator and the relevant authorities (DWS) immediately, with specialists appointed to oversee the clean-up operations.	Compliant	It was explained that diesel is merely kept in bowzers on site, whilst new and used oils, used oil filters, batteries and used oil rags are temporarily stored in controlled conditions.
C.7	Construction activity should take place during the low flow season.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding construction during low flow.
	All construction activity should be limited to the width of the existing road crossing.	Not Applicable	The construction activity of the Haul Road (completed) remained within the width of the existing road crossing.
	Existing culverts should be cleaned and inspected to ensure optimal functioning.	Compliant	Existing culverts are cleaned, with proof of inspection of the culverts included in the ECO reports.
	The required additional culvert should be sufficiently sized to accommodate expected flows within the wetland. The culvert must be at the same level as the existing culvert to prevent impoundment or concentration of flows.	Compliant	It was explained that the additional culvert is at the same level as the existing culvert to prevent impoundment or concentration of flows.
	Sediment control measures to be put in place during construction activities.	Compliant	A silt trap as well as trenches were constructed for the control of sediment.
	Ensure that no equipment is washed in the streams and wetlands of the area, and if washing facilities are provided, that these are placed no closer than 50m from a wetland or water course. No abstraction of water from the wetlands or dams should be allowed unless expressly authorized in an IWULA.	Compliant	Refer to discussion under Section C.6 above for a discussion with regards to the washing of equipment.
C.8	Construction activity should take place during the low flow season.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding construction during low flow.
	The required construction servitude for the gravel roads must be demarcated in the field prior to the commencement of any vegetation clearing activity. All construction activity must be limited to the demarcated and authorised disturbance footprints.	Compliant	Photographic evidence shows that construction activities are limited to the demarcated and authorised disturbance footprints. Further thereto, a review of the report <i>Monthly ECO compliance audit report for the Landau 3 MRD reclamation project, Witbank, Mpumalanga Province</i> , dated March 2018 and compiled by NTC Group, confirmed that all construction areas and areas of site clearance were demarcated with either survey pegs, fences or construction nets.
	All construction staff should also be educated on the importance and sensitivity of the wetland systems on site. This should form part of the induction process.	Compliant	Refer to discussion under Section C.6 above for a discussion with regards to the training provided to construction staff.
	No stockpiling of material may take place within the wetland areas and temporary construction camps and infrastructure should also be located away from these areas,	Compliant	Refer to discussion under Section C.6 above for a discussion regarding the stockpiling of material within the wetland areas.

Condition number	Condition	Finding	Observation/ Audit Evidence
	with a minimum buffer of 30m maintained from delineated wetland boundaries.		
	Haul roads must incorporate culverts (box culverts are preferred to pipe culverts) to ensure flow connectivity is maintained. Concentration of flows should be avoided as far as possible.	Compliant	Refer to discussion under Section C.5 above for a discussion regarding the construction of culverts over wetlands and drainage areas.
	Rehabilitate and re-vegetate all disturbed areas as soon as possible following disturbance.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding rehabilitation measures.
	Haul roads must include stormwater management infrastructure that will minimise sediment inputs to the wetlands and dissipate flows so as to prevent erosion at stormwater discharge points. Discharge of road runoff into grassland areas is preferred over direct discharge in to wetland areas.	Compliant	Photographic evidence shows that storm water runoff from haul roads is collected via a series of trenches and this water reports to the sump at the Landau III MRD. According to mine personnel no discharge from road runoff into grassland areas or into wetland areas takes place.
	An alien vegetation management plan should be developed and implemented. Regular removal of invasive alien species should be undertaken. This should extend right through to the decommissioning and closure phase of the project.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding the alien vegetation management plan.
C.9	Clean water will be deflected from the construction area using drains and berms.	Compliant	Photographic evidence confirmed that clean and dirty water have been separated by means of berms and channels constructed.
	Construction of concrete lined dirty water drainage system on the proposed laydown area will ensure that dirty water run-off reports to a sump from where it is pumped to the silt trap at the MRD.	Compliant	Photographic evidence confirmed that a concrete lined dirty water drainage system was constructed to ensure that dirty water run-off reports to a sump where after it will be pumped to the silt trap at the MRD.
	Install erosion prevention measure prior to the onset of construction activities to minimise the entrapment of silt in streams and wetland	Compliant	Photographic evidence confirmed that trenches and gabion structures were constructed at the onset of the project.
	Clean upslope runoff will be diverted around construction areas towards the wetland or natural water course.	Compliant	It was explained that clean upslope runoff is diverted around construction areas via a series of trenches.
	Disturbed areas should be rehabilitated and re-vegetated soon after the disturbance.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding rehabilitation measures.
	Potential contaminants used and stored on site should be stored and prepared.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding hazardous substance storage.
C.10	Construction activity should take place during the low flow.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding construction during low flow.
	The new pipeline route is located along existing infrastructure that will minimise impact on the adjacent wetlands.	Compliant	It was explained that portions of the new pipeline was constructed in areas that have been previously disturbed. The pipeline was constructed along existing infrastructure at certain sections of the pipeline route.
	Construction of the pipeline route will take place during the low flow season.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding construction during low flow.
	The HDPE pipes will be fusion welded (electro-fusion welding). This would allow homogenous joints of the HDPE pipes without compromising the load bearing capabilities and maintain same corrosion resistance.	Compliant	The mine personnel indicated that all buried HDPE pipes are fusion welded.
	All construction staff should be educated on the importance and sensitivity of the wetland systems on site. This should form part of the induction process.	Compliant	Refer to discussion under Section C.6 above for a discussion with regards to the training provided to construction staff.
	Weekly inspections of the pipeline route will be undertaken following rainfall events during the operation of the pipeline.	Compliant	Weekly inspections are conducted following rainfall events during the operation of the pipeline with such inspections captured on the SAP system.

Condition number	Condition	Finding	Observation/ Audit Evidence
	A surface water monitoring programme will take place on a monthly basis.	Compliant	Monthly surface water monitoring is conducted at Landau III as part on the greater Khwezela Colliery monitoring programme.
C.11	Construction activity should take place during the low flow season.	Not Applicable	The construction of this haul road (Khwezela Navigation to Khwezela Bokgoni) is yet to commence. An amendment to the road and subsequent environmental authorisation process was soon to be started at the time of the audit.
	All construction activity should be limited to the width of the existing road crossing.	Not Applicable	The construction of this haul road (Khwezela Navigation to Khwezela Bokgoni) is yet to commence. An amendment to the road and subsequent environmental authorisation process was soon to be started at the time of the audit.
	Existing culverts should be cleaned and inspected to ensure optimal functioning.	Not Applicable	The construction of this haul road (Khwezela Navigation to Khwezela Bokgoni) is yet to commence. An amendment to the road and subsequent environmental authorisation process was soon to be started at the time of the audit.
	The required additional culvert should be sufficiently sized to accommodate expected flows within the wetland. The culvert must be at the same level as the existing culvert to prevent impoundment or concentration of flows.	Not Applicable	The construction of this haul road (Khwezela Navigation to Khwezela Bokgoni) is yet to commence. An amendment to the road and subsequent environmental authorisation process was soon to be started at the time of the audit.
	Sediment control measures to be put in place during construction activities.	Not Applicable	The construction of this haul road (Khwezela Navigation to Khwezela Bokgoni) is yet to commence. An amendment to the road and subsequent environmental authorisation process was soon to be started at the time of the audit.
	Continue with surface water monitoring programme on monthly basis.	Compliant	Refer to discussion under Section C.10 above for a discussion regarding surface water monitoring.
C.12	Construction activity should take place during the low flow season.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding construction during low flow.
	Demarcate footprint areas of proposed gravel roads.	Compliant	Photographic evidence confirmed that the construction footprint areas of proposed gravel roads have been demarcated.
	All construction activity should be limited within the demarcated footprint.	Compliant	Photographic evidence confirmed that construction activities are limited to within the demarcated footprint.
	The required culverts should be sufficiently sized to accommodate expected flows within the wetland.	Compliant	Refer to discussion under Section C.7 above for a discussion regarding the additional culvert.
	Sediment control measures to be put in place during construction activities.	Compliant	Photographic evidence confirmed that a silt trap as well as trenches were constructed for the control of sediment.
C.13	Placement of erosion measures shall be done prior to the disturbance of vegetation or topsoil to minimise the entrainment of silt in stream and wetland.	Compliant	Refer to discussion under Section C.10 above for a discussion regarding erosion measures prior to construction.
	Dirty water concrete lined cut off drains will direct water towards the silt trap. Stormwater will be pumped to the EWRP.	Compliant	Concrete lined cut off drains were constructed. The cut off drains will direct dirty water towards the silt trap. Dirty water will be collected and pumped to the EWRP.
	Clean upslope runoff will be diverted around construction areas towards the natural water course.	Compliant	Refer to discussion under Section C.9 above for a discussion regarding diversion of clean upslope runoff.
	Service of vehicles will take place at dedicated areas with drip trays.	Compliant	Refer to discussion under Section C.3 above for a discussion regarding servicing of vehicles.
	Hazardous material will be placed in bunded areas.	Compliant	Refer to discussion under Section C.6 above for a discussion regarding the storage of hazardous material.

Condition number	Condition	Finding	Observation/ Audit Evidence
	Spill kits to clean up hydrocarbon spills will be available.	Compliant	Refer to discussion under Section C.3 above for a discussion regarding hydrocarbon spill kits.
	Hydrocarbon spills must be cleaned up immediately.	Compliant	Refer to discussion under Section C.3 above for a discussion regarding the handling of hydrocarbon spills.
C.14	N/A	Compliant	No mitigation measures provided.
C.15	Apply dust suppressants to sections of unpaved roads used. The application of dust suppressants during the dry season will depend on the frequency at which the road is used and evaporation of water off the road.	Compliant	Dust suppression is taking place by two water tanker trucks along areas in need of suppression. A dust particle binding agent is added to the water bowser to increase the suppression of dust.
	Locate soil stockpiles within site boundaries considering the location of potential sensitive receptors and the predominant wind direction.	Compliant	It was explained that there are no sensitive receptors in close proximity to the Landau III MRD or its associated soil stockpiles.
	Cover vehicles carrying dusty materials to prevent materials being blown from the vehicles.	Compliant	Trucks containing remined material from the MRD are covered as seen in shared photographic evidence.
	Set speed limits to 40km/h to minimise fugitive dust within the project boundary.	Compliant	Refer to Section C.1 above for a discussion regarding speed limits.
	Development of routine air quality monitoring programme.	Compliant	Monthly air quality monitoring reporting is conducted at Landau III as part of the greater Khwezela Colliery. It is undertaken by an external consulting firm, WSP. A Topaz meter is monitoring smaller particulates at the MRD Office, whilst dust buckets are positioned at Landau Primary School, Tasbet Park, MRD Hostel, MRD Offices and the Golf Club.
C.16	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	Compliant	Machinery and vehicles utilised at KBC are fitted with exhaust intake and muffler systems and are maintained in a good state of repair. The maintenance of all vehicles and machinery at KBC, is conducted in accordance with a maintenance schedule. The Anglo American policy ensures that all new and replacement equipment and vehicles are in line with standards and legislative requirements and further incorporate emission- reduction technology.
	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.	Compliant	
	Replace pure tone (beeping) with broadband (hissing) reversing alarms.	Compliant	It was explained that vehicles are fitted with broadband (hissing) reversing alarms.
	Maintain complaints and grievance register and act promptly to complaints regarding noise.	Compliant	KBC has implemented a complaint register whereby all complaints received are recorded actioned and closed out. Should a complaint be received with regards to noise, the Social Team will address the matter and also include it in the 'Complaints Register'. KBC will then enter into consultations with the affected party.
C.17	Graveyard to be fenced off and clearly demarcated. Construction of the laydown area should take place well outside of the fenced area.	Compliant	Photographic evidence confirmed that the graveyard at Landau III is fenced off and clearly demarcated. Construction laydown areas were placed well outside of the fenced area.
	The graveyard must be accessible to descendants at all times.	Compliant	According to mine personnel, the graveyard is made accessible to descendants at all times and should any descendants wish to visit the graveyard, they will be escorted and accompanied by security.
	A management plan for the preservation of the graveyard must be compiled by a heritage expert and must be implemented by the mine and appointed construction contractor.	Compliant	As mentioned above, the graveyard has been fenced off and no construction laydown areas were established near the graveyard. A management plan has also been developed titled <i>Landau 3 MRD: Graveyard Management Plan</i> , dated 2 March 2018. The Plan was developed by KBC using the heritage impact assessment report (<i>Archaeos Culture & Cultural Resource Consultants. A</i>

Condition number	Condition	Finding	Observation/ Audit Evidence
			<i>report on a cultural heritage impact assessment for the proposed reclamation of the Landau 3 Mine Residue Deposit at the Anglo Landau Mine, close to Emalaheni, Mpumalanga Province)</i> as reference.
	Dust control around the graveyard will be implemented.	Compliant	It was explained that dust suppression methods are implemented throughout the site including the areas around the graveyard.
	Should any additional heritage features be found during the construction phase, a chance find procedure will be implemented to manage historical sites that may be identified during clearing activities.	Compliant	According to the mine personnel no heritage features were found during the construction phase. Mine personnel indicated that should any other artefacts or cultural interest be found, it will be reported on Enablon: Incident Reporting, further disturbance of the site will be halted until a suitably qualified specialist will be called to the site to investigate the find, and recommendations thereafter have been made. Action to be taken thereafter will be undertaken in consultation with the SAHRA.
	Contractors will be informed of chance find procedure as part of environmental awareness and training.	Compliant	Chance finds are included as part of the environmental awareness and training provided to contractors as per the <i>Khwezela Environmental Induction presentation</i> that includes slides dealing with 'Heritage and Cultural resources' and 'Chance find procedure'.
	Upon finding any archaeological or historical material all work at the affected area must ceased.	Compliant	According to the mine personnel, should any other artefacts or cultural interest be found, it will be reported on Enablon: Incident Reporting, further disturbance of the site will be halted until a suitably qualified specialist will be called to the site to investigate the find, and recommendations thereafter have been made. Action to be taken thereafter will be undertaken in consultation with the SAHRA.
	The area should be demarcated in order to prevent any further work there until an investigation has been completed.		
	An archaeologist should be contacted immediately to provide advice on the matter.		
	Should it be a minor issue, the archaeologist will decide on future action, which could include adapting the HIA or not. Depending on the nature of the find, it may include a site visit.		
	SAHRA's APM Unit may also be notified.		
	If needed the necessary permit will be applied for with SAHRA. This will be done in conjunction with the appointed archaeologist.		
	The removal of such archaeological material will be done by the archaeologist in lieu of the approval given by SAHRA, including any conditions stipulated by the latter.		
	Work on site will only continue after removal of the archaeological/ historical material was done.		
C.18	Management of employment expectations through distribution of appropriate and timely information.	Compliant	According to mine personnel, the community development superintendent is responsible for overseeing the management of employee expectations through the distribution of appropriate and timely information.
	Establish a community forum (focusing on directly adjacent communities) and hold quarterly meetings in order to facilitate clear communication in order to improve relations with local communities and stakeholders.	Compliant	Community and Councilor ward forums were established to facilitate clear communication in order to improve relations with local communities and stakeholders.
	Communication with community and job-seekers regarding actual project start dates and available job opportunities.	Compliant	Meeting minutes of such forums are retained – Regular stakeholder meetings are held between KBC and the relevant stakeholders where required <i>Councillor Ward Forum minutes</i> (2 February 2018), <i>Community Ward Forum minutes</i> (9

Condition number	Condition	Finding	Observation/ Audit Evidence
			March 2018), <i>Community Ward Forum agenda</i> (19 February 2021) and <i>Community Ward Forum agenda and attendance registers</i> (26 March 2021) were provided for review), or as part of the environmental authorisation application processes for new projects.
	Undertake a skills assessment of the local area to ascertain the employability of locals.	Compliant	A skills assessment was not undertaken to ascertain the employability of locals. It was however explained that clear communication in terms of employment opportunities was provided to public as part of the Community and Councillor ward forums. The details of the employment opportunities and the qualification requirements were also defined.
	Do not employ at the contractor camps, ensure there is an employment procedure in place and known to work seekers.	Compliant	According to mine personnel, <i>the Anglo American Contractor Management Plan</i> is enforced. All contractors are monitored by the respective Head of Department. Should it be found that the contractor is not in compliance with the <i>Anglo American Contractor Management Plan</i> , such is brought to the attention of the contractor for the appropriate actions / corrections to be taken by the contractor.
	Adhere to AOL's employment standards regarding the employment of local versus regional workers.	Compliant	As per the SLP, every effort is made to source labour from the communities surrounding the operation.
	Ensure that contractors adhere to AOLs employment standards.	Compliant	According to mine personnel, all contractors and sub-contractors are provided with contractor packs and information sessions/briefings (AOLs) employment standards are included within the contractor packs. Should it be found that the contractor is not in compliance with AOLs employment standards, such is brought to the attention of the contractor for the appropriate actions / corrections to be taken by the contractor.
	Upskilling and training allowances are included in the current Khwezela Colliery SLP.	Compliant	KBC has implemented a skills development plan in accordance with the Social and Labour Plan review Landau Colliery 2014 to 2019. As per the SLP: " <i>Our training centre is ISO 9001:2008 certified and has training provider status from the Mining Qualifications Authority (MQA). We are committed to the requirements of the Skills Development Act and submit a Workplace Skills Programme and Annual Training Report to the MQA in accordance with its requirements. Oupa Ndlovu remains our skills development facilitator, while a new second skills development facilitator, Jimmy Mkhonza took up the role in 2013. He is the full-time National Union of Mineworkers shop steward at Landau. The skills development facilitator, with input from the second facilitator, is responsible for the compilation of the mine's Workplace Skills Plan and Annual Training Report. This is conducted in consultation with the mine's employment equity and skills development committees. These bodies discuss current training programmes, skills development planning, equity and operational requirements and meet quarterly, unless urgent matters arise.</i> "
C.19	Develop a clear and concise employment policy prioritizing local employment and communicate this through established communication protocols.	Compliant	KBC has developed and implemented the <i>Khwezela Colliery recruitment, selection and engagement procedure</i> , with the objective to recruit, select and engage the right people into the right positions at Khwezela Colliery, in line with the Anglo American policies, principles and values. Further, the procedure seeks to ensure fairness and eliminate any form of discrimination in the recruitment processes, through alignment with National labour legislation.

Condition number	Condition	Finding	Observation/ Audit Evidence
			Refer also to above discussions with regards to the Community and Councillor ward forums.
	Enforce the Anglo American Contractor Management Plan, which should in addition address local procurement.	Compliant	According to mine personnel, <i>the Anglo American Contractor Management Plan</i> is enforced. All contractors are monitored by the respective Head of Department. Should it be found that the contractor is not in compliance with the <i>Anglo American Contractor Management Plan</i> , such is brought to the attention of the contractor for the appropriate actions / corrections to be taken by the contractor.
	Employ staff from across community groups and the Project area and keep recruitment and employment records, distributing short- term opportunities to as many as possible.	Compliant	Refer to discussion under Section C.18 above for a discussion regarding the employment of local community members.
	Ensure that the current Khwezela Colliery SLP considers integrated development of communities impacted by the Project.	Compliant	The <i>Khwezela Colliery SLP (2014-2019)</i> considers integrated development of communities impacted by the project by conducting various community development initiatives such as constructing a multi-purpose hall in Clewer and a Community Scholarship Programme.

7.3.2 Operation Phase

Condition number	Condition	Finding	Observation/ Audit Evidence
O.1	Demarcate development footprint area. No development outside of this footprint will take place.	Compliant	The development footprint has been demarcated. To date, no development outside of this footprint has taken place.
	Vegetate stockpiles in order to minimise visual transformation of topography and ensure that the stockpiles are free draining.	Compliant	KBC is in the process of stripping and stockpiling. Once the construction phase is complete, all stockpiles will be vegetated. Rehabilitation is undertaken as progression allows.
O.2	N/A	No mitigation measures provided.	
O.3	Assess the extent of the soil contamination beneath the MRD once the MRD material has been removed.	Not Applicable	The Landau III MRD is in the process of being reworked. The assessment of the extent of the soil contamination beneath the MRD will be conducted once the MRD material has been removed.
	Excavate and dispose contaminated soil mass beneath the MRD in accordance with the waste management license as per NEMWA regulations for contaminated waste.	Not Applicable	The Landau III MRD is in the process of being reworked. The contaminated soil mass beneath the MRD will be excavated and disposed of, in accordance with the waste management license as per NEMWA regulations for contaminated waste, once the MRD material has been removed.
	An emergency response contingency plan should be implemented to address clean-up measures for soil contamination should a spill and/or a leak occur.	Compliant	KBC has developed and implemented procedures guiding the management of spillages associated with hydrocarbons, namely: <ul style="list-style-type: none"> <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>
	Storage of domestic and hazardous waste to be undertaken within a designated waste storage facility. Waste to be removed off site by a licenced contractor to a suitability licenced facility.	Compliant	The storage of domestic and hazardous waste is undertaken within a designated waste storage facility. All waste at KBC is removed of site by various contractors, waste stream dependent, for safe disposal. Safe disposal certificates are provided by the contractors and kept on record at the Environmental Department.
	Burying of any waste including rubble, domestic waste, empty containers on the site	Compliant	The burying of any waste is strictly prohibited on site. KBC has developed a

Condition number	Condition	Finding	Observation/ Audit Evidence
	should be strictly prohibited.		procedure for handling waste as per the <i>Khwezela Waste Management Procedure (AATC026501)</i> .
	Implement a speed limit of 60km/hour on all the gravel haul roads.	Compliant	Vehicle movement is restricted, and appropriate speed limits with signage in numerous locations on site are implemented, as follows: <ul style="list-style-type: none"> 30 km/h at plant and in pit. 40 km/h for heavy vehicles on haul. 40 km/h for light vehicles on haul.
O.4	Implement effective dust suppressing technologies to limit dust fallout in the surrounding areas, using surfactants such as Dustaside on exposed surfaces.	Compliant	Dust suppression with additives (Dust-a-side) is being implemented at Landau III MRD project area.
	Cover the bins of haul trucks.	Compliant	It was explained that bins of haul trucks are covered upon exiting the project area. A 'tarpaulin area' has been established for haul trucks where tarpaulins are placed over the coal loads prior to leaving the site.
	Erect roadside signs to warn drivers of the risk of animal collisions.	Not Applicable	Road signs warning drivers of the risk of animal collisions have not been erected as the site does not have large animals at risk of collision.
	Restrict vehicles to travelling only on designated roadways to limit the ecological footprint of the proposed development.	Compliant	Vehicles are only permitted to driving on designated roadways. Safety berms were constructed to ensure that vehicles stay within designated roadways.
O.5	Limit all mining activity to within the disturbed footprint of the MRD and authorised disturbance footprints.	Compliant	Mining activity is currently taking place within the disturbed footprint of the Landau III MRD and authorised disturbance footprints. No vehicle may deviate from existing roads.
	Implement dust suppression within areas where carbonaceous dust may be generated and areas of heavy vehicle traffic.	Compliant	Dust suppression is being implemented in the project area where required.
	Upgrade and maintain dirty water infrastructure around the MRD and all sources of potential dirty water.	Compliant	Dirty water infrastructure around the MRD is currently being upgraded. A dirty water pipeline transporting waste water to the EWRP was constructed.
	Regular inspections of all water management infrastructure must be undertaken and detailed records of such inspections maintained.	Compliant	Monthly inspections are undertaken of all water management infrastructure with such inspections captured on the SAP system or on specific job cards.
O.6	Cover the bins of haul trucks to prevent spillage.	Compliant	Bins of haul trucks are covered upon exiting the project area.
	Implement dust suppression within areas where carbonaceous dust may be generated and areas of heavy vehicle traffic. Implement dust suppression on haul trucks.	Compliant	Dust suppression is being implemented throughout the project area.
	Compile an emergency response procedure for clean-up of any major spillages along the proposed haul routes.	Compliant	Refer to discussion under Section O.3 above for a discussion regarding the emergency response procedure for clean-up of major spillages.
O.7	Weekly inspections of the pipeline route to check for leaks during the rainy season.	Compliant	As described above, regular inspections are undertaken of all water management infrastructure with such inspections captured on the SAP system or on specific job cards.
	Continue with surface water monitoring programme on monthly basis.	Compliant	As previously described, monthly surface water monitoring by Aquatico Scientific is being conducted at Landau III as part on the great Khwezela North Monitoring programme.
	Compile an emergency response procedure for clean-up of any major spillages along the pipeline route.	Compliant	Refer to discussion under Section O.3 above for a discussion regarding the emergency response procedure for clean-up of major spillages.
O.8	Limit all reclaiming activities to within the disturbed footprint of the MRD and authorised	Compliant	All reclaiming activities are being undertaken within the disturbed footprint of the

Condition number	Condition	Finding	Observation/ Audit Evidence
	disturbance footprints.		MRD and authorised disturbance footprints, as confirmed during the site audit.
	Weekly inspection of dirty water concrete lined cut off drains that direct storm water towards the silt trap and sump.	Compliant	As described above, regular inspections are undertaken of all water management infrastructure with such inspections captured on the SAP system or on specific job cards.
	Ensure that clean upslope runoff is diverted around operational areas.	Compliant	It was explained that clean upslope runoff is diverted around operational areas.
	Service of vehicles will take place at dedicated areas with drip trays.	Compliant	All vehicles were being serviced at the central garage. A hard park was constructed, as part of the reclamation of the MRD, that would include the construction of workshops where vehicles will be serviced.
	Hazardous material will be placed in bunded/contained areas.	Compliant	Refer to discussion under Section O.3 above for a discussion regarding waste management.
	Continue with surface water monitoring programme on monthly basis.	Compliant	Refer to discussion under Section O.7 above for a discussion regarding monthly surface water monitoring.
O.9	Cover the bins of haul trucks to prevent spillage	Compliant	The bins of haul trucks are covered upon exiting the project area.
	Continue with surface water monitoring programme on monthly basis.	Compliant	Refer to discussion under Section O.7 above for a discussion regarding monthly surface water monitoring.
	Implement the emergency response procedure for clean-up of any major spillages along the proposed haul routes.	Compliant	Refer to discussion under Section O.3 above for a discussion regarding the emergency response procedure for clean-up of major spillages.
O.10	Cladding of non-producing zones remains intact during reclamation.	Compliant	It was explained that cladding in non-producing zones is intact.
	Increasing production rate per bench where possible.	Not Applicable	This condition may not apply to the mine.
	Continue with groundwater quality monitoring programme on quarterly basis.	Compliant	Quarterly groundwater quality monitoring is being conducted at 3 monitoring localities at the Landau III MRD by both Aquatico Scientific and Regen Waters.
	Weekly inspection of dirty water concrete lined cut off drains that direct storm water towards the silt trap and sump.	Compliant	According to mine personnel weekly inspections of dirty water concrete lined cut off drains are undertaken, with such inspections captured on the SAP system or on specific job cards.
O.11	Apply dust suppressants to sections of unpaved roads used routinely by vehicles. The application of dust suppressants during the dry season will depend on the frequency at which the road is used and evaporation of water off the road.	Compliant	Dust suppression is reportedly being implemented throughout the project area.
	Cover hauling vehicles to prevent materials being blown from the vehicles.	Compliant	It was explained that the bins of haul trucks are covered upon exiting the project area at the Tarpaulin Area. Truck drivers have to leave keys to their trucks in a controlled box and may only retrieve the keys once a cover is placed over the truck load.
	Implement a speed limit of 60km/hour on all the gravel haul roads.	Compliant	Refer to discussion under Section O.4 above for a discussion regarding speed limits.
	Continue with air quality monitoring programme on a monthly basis.	Compliant	Monthly air quality monitoring reporting is conducted at Landau III as part of the greater Khwezela North Colliery.
O.12	Benches must be sloped to at least 1:2 to ensure sufficient cooling of oxidising material. Reclaimed cladding material must be placed against exposed coarse material to a minimum thickness of 1.0m to minimise the possibility of SponCom.	Compliant	It was explained that, due to the material contained within the Landau III MRD, the possibility of SponCom taking place is minimal.
	Profiling the bench to a 1:2 slope for the prevention of SponCom is operationally complex. This is negated by splitting the bench into three separate flitches of 1.5m each.	Compliant	According to mine personnel the current practice being undertaken at Landau III MRD is that each bench is being reworked individually, therefore, the bench cannot be profiled at 1:2. Once the bench has been reworked, the cladding will

Condition number	Condition	Finding	Observation/ Audit Evidence
	Cladding of open coarse material in the bench face when expected exposure to oxygen exceeds 3 days to minimise the possibility of SponCom.		be removed. Should SponCom occur, the area will be cladded.
	Cladding of non-producing mining bench faces.	Not Applicable	No non-producing mining bench faces have yet been encountered that require cladding.
	Increasing the mining production rate per bench to ensure coarse material is expeditiously removed from the MRD and treated in the processing plants. This will reduce the amount of air exposure time for material in the mining face.	Compliant	It is proposed that the Landau III MRD will be reworked over a period of 5 years. According to KBC personnel, the mining production rate per bench will be at full capacity.
	Reducing the mining bench height to enable a faster advance of the mining face to reduce the air exposure time.	Compliant	As per the proposed method of reworking of Landau III, the height of the benches will be reduced as the MRD is being reworked.
	Sloping of mining benches to enable cooling by wind across the bench face	Compliant	According to KBC personnel, the mining benches will be sloped to enable cooling by wind across the bench face.
	In the event that SponCom does occur in an area of the mining face, the following procedural steps are advised: Close radio contact between the supervisor and excavator operator must be maintained. Material from historical SponCom areas must be spread after excavation. Historical SponCom areas have material that has been burnt out completely containing retained heat in the clinker/ ash which cools quickly when spread.	Compliant	According to mine personnel, due to the material contained within the Landau III MRD, the possibility of spontaneous combustion taking place is minimal. Dust suppression was also undertaken in the active reworking area, further minimising the possibility of spontaneous combustion.
	Material that is actively combusting should be handled as follows: Temperature must be monitored by a hand held infrared gun type which gives a quick indication of how hot an area is and how quickly it cools. The excavator must work slowly into the burnt material and make sure the area is stable before advancing or build a platform. The combusting area must be over excavated by 3m. Re-shape the mining face area by placing a 1m thick layer of inert material followed by 2m of compacted coarse material covered with cladding to get the required profile.	Compliant	With respect to existing management measures as relevant to Khwezela Colliery: SponCom monitoring is undertaken by the Technical Services Department. Khwezela Colliery has also appointed a SponCom Head of Department. In the event of spontaneous combustion occurring, radio contact is made to ensure that the relevant responsible personnel are made aware of spontaneous combustion taking place. Cladding is then applied to the area of spontaneous combustion.
O.13	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	Compliant	The maintenance of all vehicles and machinery at KBC, is conducted in accordance with a maintenance schedule. This maintenance schedule is further maintained, tracked and actioned on the system known as SAP.
	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.	Compliant	According to mine personnel should any vehicles or equipment produce high levels of noise emissions, this will be logged as a complaint on Enablon and thereafter actioned and closed out by the relevant KBC personnel.
	Replace pure tone (beeping) with broadband (hissing) reversing alarms.	Compliant	It was explained that vehicles are fitted with broadband (hissing) reversing alarms.
	Maintain complaints and grievance register and act promptly to complaints regarding noise.	Compliant	KBC has implemented a complaint register whereby all complaints received are recorded actioned and closed out. Should a complaint be received with regards to noise, such will be investigated to determine if it is as a result of mine activities. KBC will then enter into consultations with the affected party.
	The reclamation of the MRD as well as the hauling of the material will only take place during day light hours.	Compliant	Mine personnel confirmed that the reclamation of the MRD only takes place during day light hours, however hauling of material also takes place at night.

Condition number	Condition	Finding	Observation/ Audit Evidence
O.14	N/A	No mitigation measures provided.	
O.15	Drivers of heavy vehicles should attend a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road.	Compliant	All drivers of heavy vehicles have attended a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road. Records with regards to training are retained.
	A standard operating procedure should be developed for all mine drivers to identify and report potholes and edge breaks to the operations manager who in turn will report it to the relevant authorities.	Compliant	Planned job observations are undertaken for all work described within standard operating procedures.
	Traffic conditions to be monitored annually, should traffic congestion increase, appropriate mitigation measures will need to be explored and implemented.	Compliant	Traffic scenarios are assessed regularly by the mine and changes are made to routes, road signage, traffic control mechanisms etc. as the need arises.
O.16	Management of employment expectations through distribution of appropriate and timely information.	Compliant	The Community development superintendent is responsible for overseeing the management of employee expectations through the distribution of appropriate and timely information. Community and Councillor ward forums were established to facilitate clear communication in order to improve relations with local communities and stakeholders. Records in the form of minutes are retained.
	Quarterly meetings with community forum in order to facilitate clear communication and maintain relations with local communities and stakeholders.	Compliant	
	Communication with community and job-seekers regarding actual project start dates and available job opportunities.	Compliant	
	Do not employ at the contractor camps, ensure there is an employment procedure in place and known to work seekers.	Compliant	Refer to discussions under Section C.18 above for a discussion regarding community engagement. Appointments have to go through the Community Forum after the mine communicates its appointments/skills needs.
	Adhere to AOL's employment standards regarding the employment of local versus regional workers.		
	Ensure that contractors adhere to AOLs employment standards.		
	Upskilling and training allowances are included in the current Khwezela Colliery SLP.		
O.17	Implement the employment policy prioritizing local employment and communicate this through established communication protocols.	Compliant	Refer to discussions under Section C.18 above for a discussion regarding community engagement.
	Enforce the Anglo American Contractor Management Plan, which should in addition address local procurement.	Compliant	According to mine personnel, <i>the Anglo American Contractor Management Plan</i> is enforced. All contractors are monitored by the respective Head of Department. Should it be found that the contractor is not in compliance with the <i>Anglo American Contractor Management Plan</i> , such is brought to the attention of the contractor for the appropriate actions / corrections to be taken by the contractor.
	Employ staff from across community groups and the Project area and keep recruitment and employment records, distributing short- term opportunities to as many as possible.	Compliant	Refer to discussion under Section C.18 above for a discussion regarding the employment of local community members.
	Ensure that the current Khwezela Colliery SLP considers integrated development of communities impacted by the Project.	Compliant	Refer to discussions under Section C.19 above for a discussion regarding developing of communities impacted by the project.

7.3.3 Decommissioning Phase

Condition number	Condition	Finding	Observation/ Audit Evidence
D.1	Develop a rehabilitation and closure plan.	Compliant	A rehabilitation and closure plan was being finalised at the time of the audit.
	Topsoil and vegetate final whale back shape of MRD	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and

Condition number	Condition	Finding	Observation/ Audit Evidence
	Ensure that the rehabilitated area is free draining.		offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
	Inspect adequacy of vegetation regrowth as per the closure plan		
D.2	N/A	No mitigation measures provided.	
D.3	Vehicles to be serviced at a dedicated workshop in a bunded area to prevent spillage and contamination with hydrocarbons.	Compliant	All vehicles are currently being serviced at the central garage. A hard park was constructed, as part of the reclamation of the MRD, that includes a workshop where vehicles are serviced.
	Implement the leak/spill procedure for all possible areas of leaks/spillages.	Compliant	KBC has developed and implemented procedures guiding the management of spillages associated with hydrocarbons, namely: <ul style="list-style-type: none">• <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497)</i>.
	Spill kits will be provided for on site for spill clearing.	Compliant	Photographic evidence previously showed that that spill kits are available, where relevant to the reclamation of the Landau III MRD Project.
	Spills will be cleared and remediated immediately as per the mine's Leak/Spill Procedure	Compliant	It was explained that in the event of a spill incident, spills are cleared and remediated as per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026947)</i> .
D.4	Assess the extent of the soil contamination beneath the MRD once the MRD material has been removed.	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
	Excavate and dispose contaminated soil mass beneath the MRD in accordance with the waste management license as per NEMWA regulations for contaminated waste.		
	Contaminated soils should not be used for the capping and rehabilitation of the final shaped MRD.		
D.5	Footprint areas of demolition activities must be kept as small as possible.	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
	Rehabilitation of disturbed areas must be implemented and grass seeds of species indigenous to the area must be used.		
	Monitoring and control of Alien and Invasive Plants (AIP) must be done during the decommissioning and closure phase.		
	All mitigations and recommendations set out in the AIP Control Plan must be adhered to.		
	Seed dispersal of AIP must be prevented as far as possible caused by operational activities.		
	AIP control must be carried out by a registered contractor.		
	Disturbed areas caused during the demolition activities need to be ripped and rehabilitated and seeded with grass seeds indigenous to the area.		
	Care must be taken when rehabilitation activities need to be performed within wetlands and associated buffer zones as these areas are sensitive and manual labour needs to be the preferred option.		
D.6	All decommissioning activity must be limited to the extent of disturbance footprints.	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
	Decommissioning activities should be undertaken during the dry season as far as possible.		

Condition number	Condition	Finding	Observation/ Audit Evidence
	<p>All disturbed areas should be landscaped to approximate the natural landscape profile, but should avoid steep slopes and concentrated run-off. Compacted soils should be ripped and scarified.</p> <p>The rehabilitated areas should be re-vegetated as soon as possible following completion of the earthworks to minimise erosion. Regular long-term follow up of rehabilitated areas will be required to ensure the successful establishment of vegetation and to survey for any erosion damage on site. Erosion damage should be repaired immediately.</p> <p>Implementation of the alien vegetation management plan. Regular removal of invasive alien species should be undertaken.</p> <p>All potential contaminants and solid waste must be removed off site. Contaminated soils should be ameliorated on site is possible, or otherwise removed.</p>		yet applicable.
D.7	<p>Dirty water management infrastructure should remain in place until rehabilitation activities have been completed and vegetation establishment on the MRD is successful.</p> <p>Revegetation of the MRD should utilise locally occurring indigenous species.</p> <p>Implementation of the alien vegetation management plan.</p> <p>Removal of coal fines from the wetland between the MRD and laydown area in order improve the PES (current F) of the wetland.</p>	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
D.8	<p>All decommissioning activity must be limited to the extent of disturbance footprints.</p> <p>Decommissioning activities should be undertaken during the dry season as far as possible</p> <p>All disturbed areas within the laydown and stockpile area should be landscaped to approximate the natural landscape profile, but should avoid steep slopes and concentrated run-off.</p> <p>Dirty water management infrastructure should remain in place until rehabilitation activities have been completed and vegetation establishment on the MRD is successful.</p>	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
D.9	<p>Compaction, cladding and shaping of material into a whaleback post reclamation.</p> <p>Revegetation of the MRD should utilise locally occurring indigenous species.</p> <p>Inspect adequacy of vegetation regrowth as per the closure plan.</p> <p>Dirty water management infrastructure should remain in place until rehabilitation activities have been completed and vegetation establishment on the MRD is successful.</p>	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
D.10	<p>Apply dust suppressants to sections of unpaved roads used. The application of dust suppressants during the dry season will depend on the frequency at which the road is used and evaporation of water off the road. .</p> <p>Cover vehicles carrying dusty materials to prevent materials being blown from the vehicles.</p> <p>Set speed limits to 40km/h minimise the creation of fugitive dust within the project boundary.</p> <p>Continue implementing the routine air quality monitoring programme.</p>	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.

Condition number	Condition	Finding	Observation/ Audit Evidence
D.11	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	Not Applicable	The reclamation of Landau III MRD is currently in construction (workshops and offices) and partially operational phase (reworking of the Landau III MRD). Therefore, proposed mitigation measures as provided within this section are not yet applicable.
	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.		
	Replace pure tone (beeping) with broadband (hissing) reversing alarms.		
	Maintain complaints and grievance register and act promptly to complaints regarding noise.		
D.12	N/A	No mitigation measures provided.	
D.13	N/A	No mitigation measures provided.	

7.4 LANDAU III BORROW PIT BAR

7.4.1 Construction Phase

Condition Number	Condition	Finding	Observation / Audit Evidence
C.1	Not applicable	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
C.2	Not applicable.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
C.3	The footprint of the proposed borrow pit should be clearly demarcated to restrict vegetation clearing activities within the infrastructure footprint as far as practically possible.	Not Applicable	
	Vegetation clearance and commencement of construction activities should be scheduled, where possible, to coincide with low rainfall conditions when the erosive stormwater and wind are anticipated to be low.		
	Excavation of soil should be limited within the demarcated areas as far as practically possible.		
	The recovered soils should be used to rehabilitate the borrow pit footprint during the closure phase as part of the rehabilitation process (i.e. resurfacing).		
	The topsoil removed from the borrow pit area during construction should be stockpiled for use during the rehabilitation phase. Adequate measures should be in place to protect the stockpiled topsoil from erosion and sedimentation.		
	Additional excavation and stockpiling of undisturbed soils should be limited as far as practically possible to minimize exposure risk during typically long duration stockpiling.		
	A regulated speed limit of ≤ 40 km per hour within the cleared areas should be maintained		

	to minimise dust generation during the construction activities.		No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Bare soils should be regularly dampened with water to suppress dust during the construction phase, especially when strong wind conditions are predicted according to the local weather forecast.		
	All disturbed areas adjacent to the borrow pit should be revegetated with an indigenous grass mix to re-establish a protective cover, in order to minimize soil erosion and dust emission.		
C.4	The footprint of the proposed borrow pit should be clearly demarcated to restrict vegetation clearing activities within the infrastructure footprint as far as practically possible.	Not Applicable	
	The topsoil removed from the borrow pit area during construction should be stockpiled for use during the rehabilitation phase. Adequate measures should be in place to protect the stockpiled topsoil from erosion and sedimentation.		
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
	Use stockpiled topsoil for rehabilitation of backfilled borrow pit.		
	Topsoiled areas should be re-vegetated with an indigenous grass mix to re-establish a protective cover, in order to minimize soil erosion and dust emission.		
C.5	All vehicular traffic should be restricted to the development area and existing service roads as far as practically possible.	Not Applicable	
	Compacted soils adjacent to the borrow pit footprint should be lightly ripped to at least 25 cm below ground surface (bgs) to alleviate compaction prior to re-vegetation.		
C.6	Unauthorized discharge of potentially contaminated stormwater from the borrow pits should be strictly prohibited on site.	Not Applicable	
	Spill kits will be provided on site for spill clearing.		
	Contaminated soil must removed and disposed of at the hazardous waste storage facility on site.		

	No servicing of vehicles on site.		
	No fuel bowzers will be placed on site. Only mobile bowzers will be on site to refill vehicles when necessary.		
	Drip trays to be placed underneath heavy vehicles parked on site.		
	An emergency response contingency plan should be put in place to address clean-up measures should a spill and/or a leak occur, as well as preventative measures to prevent ingress.		
	Burying of any waste including rubble, domestic waste, empty containers on the site should be strictly prohibited and all construction rubble waste must be removed to an approved disposal site.		
	Storage of domestic and hazardous waste to be undertaken within a designated waste storage facility.		
	Waste to be removed off site by licensed contractor to a suitably licenced facility.		
C.7	Demarcate the construction footprint and ensure that all construction activities remain within this footprint.		
	Ensure that the proposed development footprint area remain as small as possible.		
	Restrict vehicles to travelling only on designated roadways to limit the ecological footprint of the proposed development.		
	Prior to any disturbance taking place, the proposed construction footprint and the immediate surroundings must be surveyed, and any floral SCC identified must be rescued and relocated by a suitably qualified specialist. A detailed rescue and relocation plan must be developed for the floral SCC as listed in the Biodiversity report (Appendix 5-3).		
	All necessary permits must be applied for from the MTPA if a vegetation SCC is found and requires relocation.		
	Prohibit the collection of plant material for medicinal purposes.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
C.8	Construction will be limited to the project footprint.		
	No servicing of vehicles on site.		
	No fuel bowzers will be placed on site. Only mobile bowzers will be on site to refill vehicles when necessary.		
	Drip trays to be placed underneath heavy vehicles parked on site.	Not Applicable	

<p>Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.</p>		No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
<p>Spill-sorb or a similar product will be kept on site, and used to clean up hydrocarbon spills in the event that they should occur.</p>		
<p>Erosion protection measures will be implemented at steep areas.</p>		
<p>Storage of domestic and hazardous waste to be undertaken within a designated waste storage facility.</p>		
<p>Waste to be removed off site by licensed contractor to a suitably licenced facility.</p>		
<p>An appropriate sewage management strategy will be implemented during the construction phase.</p>	Not Applicable	
<p>Khwezela Colliery has an existing surface water quality sampling network and management plan, which will be continued during the construction, operation and closure of the borrow pits project.</p>		
<p>If erosion is evident, or the water quality monitoring indicates an increase in suspended solids, water management around the construction areas will be reviewed.</p>		
<p>A Construction Stormwater Management Plan will be compiled and implemented as described below:</p>		
<p>Construction Stormwater Management Plan A construction stormwater management plan must be developed and implemented prior to the commencement of vegetation clearing activities or excavation activities and be maintained until the end of the construction phase. Such a plan should aim to minimise the transport of sediment off site.</p> <p>Sediment traps and sediment barriers should be installed where necessary, and stormwater discharge points should be protected against erosion and incorporate energy dissipaters.</p> <p>Erosion within the construction site must be minimised through the following:</p> <ul style="list-style-type: none">• Limiting the area of disturbance and vegetation clearing to as small an area as possible;• Where possible, undertaking construction during the dry season;• Phasing vegetation clearing activities and limiting the time that any one area of bare soil is exposed to erosion;• Control of stormwater flowing onto and through the site. Where required, stormwater from upslope should be diverted around the construction site;• Prompt stabilisation and re-vegetation of soils after disturbance and construction activities in an area are complete; and• Protection of slopes. Where steeper slopes occur, these should be stabilised using		

	geotextiles or any other suitable product designed for the purpose.		
	<p>Sediment transport off the site must be minimised through the following:</p> <ul style="list-style-type: none"> Establishing perimeter sediment controls. This can be achieved through the installation of sediment fences along downslope verges of the borrow pit site where surface flows leave the site. Where channelled or concentrated flow occurs, reinforced sediment fences or other sediment barriers such as sediment basins should be used (refer to US EPA guidelines on Stormwater Pollution Prevention); Discharge of stormwater from the construction site into adjacent grassland. Discharged flows must be slow and diffuse; and Regular inspection and maintenance of sediment controls 		
C.10	All borrow pit activities must be limited to within the proposed borrow pit footprint.		
	Access to the borrow pits must make use of existing roads and farm tracks as far as possible. Only a single access route into each borrow pit should be utilised.		
	Vegetation clearance should be limited to as small an area as possible and should be phased to prevent large exposed areas lying unused for long periods.		
	A stormwater management plan, including sediment control measures, must be implemented for the proposed borrow pit sites. Refer to management measures in C.8.		
	An alien vegetation management plan must be drawn up for the borrow pit area to clear and control alien vegetation, with special emphasis on the wattle trees (Acacia sp.)	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
C.11	Apply dust suppressants to sections of unpaved roads used. The application of dust suppressants during the dry season will depend on the frequency at which the road is used and evaporation of water off the road.		
	Locate soil stockpiles within site boundaries considering the location of potential sensitive receptors and the predominant wind direction.		
	During grading activities, any earth exposed for long periods must be watered, especially during windy conditions.		
	Cover vehicles carrying dusty materials to prevent materials being blown from the vehicles.		
	Set speed limits to 40km/h within the borrow pit site and 60 km/h on gravel haul roads to minimise the creation of fugitive dust.		
	Increase dust suppression on windy days or when fugitive dust is dispersed from the site.		
	Development of routine air quality monitoring programme.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
C.12	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.		
	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.		
	Replace pure tone (beeping) with broadband (hissing) reversing alarms.		
	Maintain complaints and grievance register and act promptly to complaints regarding noise.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.

C.13	<p>Heritage chance find procedure:</p> <ul style="list-style-type: none"> • Upon finding any archaeological or historical material all work at the affected area must ceased. • The area should be demarcated in order to prevent any further work in the area until an investigation has been completed. • An archaeologist should be contacted immediately to provide advice on the matter. • Should it be a minor issue, the archaeologist will decide on future action, which could include adapting the HIA or not. Depending on the nature of the find, it may include a site visit. • SAHRA's Archaeology, Palaeontology and Meteorites Unit (APM) Unit may also be notified. • If needed the necessary permit will be applied for with SAHRA. This will be done in conjunction with the appointed archaeologist. • The removal of such archaeological material will be done by the archaeologist in lieu of the approval given by SAHRA, including any conditions stipulated by the latter. • Work on site will only continue after removal of the archaeological/ historical material was done. 	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a "Not applicable" finding is recorded.
C.14	<p>Management of employment expectations through distribution of appropriate and timely information.</p> <p>Establish a community forum (focusing on directly adjacent communities) and hold quarterly meetings in order to facilitate clear communication in order to improve relations with local communities and stakeholders.</p> <p>Communication with community and job-seekers regarding actual project start dates and available job opportunities.</p> <p>Undertake a skills assessment of the local area to ascertain the employability of locals.</p> <p>Do not employ at the contractor camps, ensure there is an employment procedure in place and known to work seekers.</p> <p>Adhere to AOP's employment standards regarding the employment of local versus regional workers.</p> <p>Ensure that contractors adhere to AOPLs employment standards.</p> <p>Upskilling and training allowances are included in the current Khwezela Colliery Social and Labour Plan (SLP).</p>	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a "Not applicable" finding is recorded.

7.4.2 Operational Phase

Condition Number	Condition	Finding	Observation / Audit Evidence
O.1	The footprint of the proposed borrow pit should be clearly demarcated to restrict excavation activities within the infrastructure footprint as far as practically possible.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a "Not applicable" finding is recorded.

	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
O.2	The footprint of the proposed borrow pit should be clearly demarcated to restrict excavation activities within the infrastructure footprint as far as practically possible.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
O.3	Unauthorized discharge of potentially contaminated stormwater from the borrow pits should be strictly prohibited on site.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Spill kits will be provided on site for spill clearing.		
	Contaminated soil must removed and disposed of at the hazardous waste storage facility on site.		
	No servicing of vehicles on site.		
	No fuel bowsers will be placed on site. Only mobile bowsers will be on site to refill vehicles when necessary.		
	Drip trays to be placed underneath heavy vehicles parked on site.		
	An emergency response contingency plan should be put in place to address clean-up measures should a spill and/or a leak occur, as well as preventative measures to prevent ingress.		
	Burying of any waste including rubble, domestic waste, empty containers on the site should be strictly prohibited and all construction rubble waste must be removed to an approved disposal site.		
	Storage of domestic and hazardous waste to be undertaken within a designated waste storage facility.		
	Waste to be removed off site by licensed contractor to a suitably licenced facility.		
O.4	Refer to C.4 above.	Not Applicable	
O.5	Implement a speed limit of 60km/hour on all haul roads along with rumble strips and speed bumps or other suitable speed reduction measures;	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Implement effective dust suppressing technologies to limit dust fallout in the surrounding areas.		
	Haul trucks to be covered to minimise dust fallout on surrounding vegetation.		

	Erect roadside signs to warn drivers of the risk of animal collisions;		
	Restrict vehicles to travelling only on designated roadways to limit the ecological footprint of the proposed development.		
O.6	All management measures as presented in C.8 should be implemented during the operational phase.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
O.7	Refer to impact description C.9.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
O.8	Refer to impact description and mitigation measures in C.10.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
O.9	Apply dust suppressants to sections of unpaved roads used. The application of dust suppressants during the dry season will depend on the frequency at which the road is used and evaporation of water off the road.	Not Applicable	
	Locate soil stockpiles within site boundaries considering the location of potential sensitive receptors and the predominant wind direction.		
	During grading activities, any earth exposed for long periods must be watered, especially during windy conditions.		
	Cover vehicles carrying dusty materials to prevent materials being blown from the vehicles.		
	Set speed limits to 40km/h within the borrow pit site and 60 km/h on gravel haul roads to minimise the creation of fugitive dust.		
	Increase dust suppression on windy days or when fugitive dust is dispersed from the site.		
	Continue with routine air quality monitoring programme.		
O.10	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.		
	Replace pure tone (beeping) with broadband (hissing) reversing alarms.		
	Hauling of material will only take place during daylight hours.		
	Maintain complaints and grievance register and act promptly to complaints regarding noise.		
O.11	Refer to the Heritage Chance Find Procedure in C.13.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.

O.12	The borrow pit area must be fenced off with a security fence.	Not Applicable	No activities associated with the construction and utilisation of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	The fenced off area must be patrolled weekly to ensure integrity of fencing.		
	Access control to the borrow pit must be strictly controlled at the entrance, providing access only to approved persons.		

7.4.3 Decommissioning Phase

Condition Number	Condition	Finding	Observation / Audit Evidence
D.1	The footprint of the proposed borrow pit should be clearly demarcated to restrict excavation activities within the infrastructure footprint as far as practically possible.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
D.2	The footprint of the proposed borrow pit should be clearly demarcated to restrict excavation activities within the infrastructure footprint as far as practically possible.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
D.3	All vehicular traffic should be restricted to the development area and existing service roads as far as practically possible;	Noted	These activities may occur in the near future pending the Care & Maintenance period. Accordingly, a “Noted” finding is recorded.
	Compacted soils adjacent to the borrow pits footprint can be lightly ripped to at least 25 cm bgs to alleviate compaction prior to re- vegetation		
	The surface should be reshaped in a manner that allows water to drain freely to the environment without leading to erosion or ponding		
	The recovered soils should be used to rehabilitate the borrow pits footprint as part of the rehabilitation process (i.e. resurfacing).		
	Clean over burden material can be used, if possible, to compensate for the material that will be borrowed, so as to reinstate the natural landscape.		
	Burying of any waste including rubble, domestic waste, empty containers on the site should be strictly prohibited and all construction rubble waste must be removed to an		

	approved disposal site.		
D.4	The footprint of the proposed borrow pit should be clearly demarcated to restrict vegetation clearing activities within the infrastructure footprint as far as practically possible.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	The topsoil removed from the borrow pit area during construction should be stockpiled for use during the rehabilitation phase. Adequate measures should be in place to protect the stockpiled topsoil from erosion and sedimentation.		
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
	Use stockpiled topsoil for rehabilitation of backfilled borrow pit.		
	Topsoiled areas should be re-vegetated with an indigenous grass mix to re-establish a protective cover, in order to minimize soil erosion and dust emission.		
D.5	Footprint areas of demolition activities must be kept as small as possible.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
	Rehabilitation of disturbed areas must be implemented and grass seeds of species indigenous to the area must be used.		
	Develop an Alien and Invasive Plant (AIP) Control Plan for the decommissioning and closure phase.		
	Monitoring and control of AIP must be done during the decommissioning and closure phase.		
	All mitigations and recommendations set out in the AIP Control Plan must be adhered to.		
	Seed dispersal of AIP must be prevented as far as possible caused by closure activities.		
	AIP control must be carried out by a registered contractor.		
	Disturbed areas caused during the demolition activities need to be ripped and rehabilitated and seeded with grass seeds indigenous to the area.		
D.6	Borrow pit to be shaped to be free-draining if possible. Where free drainage is not possible given the depth of the excavation, it is recommended that the borrow pit be shaped so that water collects at a single point within the borrow pit so as to create an artificial wetland habitat within the borrow pit	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	No steep slopes should remain within the borrow pit. Steep slopes should be landscape		

	to no steeper than 1:3, but ideally 1:5 or lower.		
	The borrow pit footprint should be covered with topsoil and revegetated with indigenous, locally occurring grass species. Re- vegetated areas should be monitored for successful establishment of vegetation for a period of at least 1 completed growing season.		
	During earthworks, stormwater management and sediment control measures should remain in place		
D.7	Refer to impact description C.9.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
D.8	Borrow pit to be shaped to be free-draining if possible. Where free drainage is not possible given the depth of the excavation, it is recommended that the borrow pit be shaped so that water collects at a single point within the borrow pit so as to create an artificial wetland habitat within the borrow pit	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	No steep slopes should remain within the borrow pit. Steep slopes should be landscape to no steeper than 1:3, but ideally 1:5 or lower.		
	The borrow pit footprint should be covered with topsoil and revegetated with indigenous, locally occurring grass species. Re- vegetated areas should be monitored for successful establishment of vegetation for a period of at least 1 completed growing season.		
	During earthworks, stormwater management and sediment control measures should remain in place.		
	An alien vegetation management plan should be drawn up by the Environmental Co-ordinator and implemented. Regular removal of invasive alien species should be undertaken. This should extend right through to the decommissioning and closure phase of the project.		
	All potential contaminants and solid waste must be removed off site. Contaminated soils should be ameliorated on site is possible, or otherwise removed.		
D.9	Apply dust suppressants to sections of unpaved roads used. The application of dust suppressants during the dry season will depend on the frequency at which the road is used and evaporation of water off the road.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	During grading activities, any earth exposed for long periods must be watered, especially during windy conditions.		
	Set speed limits to 40km/h within the borrow pit site to minimise the creation of fugitive dust.		
	Increase dust suppression on windy days or when fugitive dust is dispersed from the site.		

	Continue with routine air quality monitoring programme.		
D.10	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	Noted	These activities may occur in the near future pending the Care & Maintenance period. Accordingly, a “Noted” finding is recorded.
	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.		
	Replace pure tone (beeping) with broadband (hissing) reversing alarms.		
	Rehabilitation will only take place during daylight hours.		
	Maintain complaints and grievance register and act promptly to complaints regarding noise.		
D.11	Please refer to the Heritage Chance Find Procedure in C.13.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
D.12	Pit wall stability and design to be evaluated in order to ensure that any persons or animal life that may enter to pit can exit safely, as well as to prevent future erosion and collapse of the wall.	Not Applicable	No activities associated with the construction, utilisation and decommissioning of the borrow pit have yet taken place. Accordingly, a “Not applicable” finding is recorded.
	Fence to only be removed once the borrow pit rehabilitation is complete and the site have been declared safe by a registered engineer.		
	Backfill the borrow pit void with available material.		
	Backfilled borrow pit should be shaped to be free draining.		
	Borrow pit to be shaped to be free-draining if possible. Where free drainage is not possible given the depth of the excavation, it is recommended that the borrow pit be shaped so that water collects at a single point within the borrow pit so as to create an artificial wetland habitat within the borrow pit.		
	No steep slopes should remain within the borrow pit. Steep slopes should be landscape to no steeper than 1:3, but ideally 1:5 or lower.		

7.5 PIT 2A EXTENSION PROJECT – ENVIRONMENTAL AUTHORISATION (DMR REF No: (MP)30/5/1/1/3/2/2(307)EA)), APPROVED 27 SEPTEMBER 2017

CONDITION NUMBER	CONDITION	FINDINGS	OBSERVATIONS/AUDIT EVIDENCE
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.	Noted	The holder of the authorisation is aware of and comprehends this condition.
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.	Noted	The holder of the authorisation is aware of and comprehends this condition.
8.1.3	This activity must commence within a period of five (5) 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.	Compliant	The authorisation was granted by the DMR on 27 September 2017 and construction activities of the Haul Road had commenced. Construction had therefore commenced within 5 years from the date of issue of the authorisation.
8.1.4	If the proponent anticipates that commencement of the activity would not occur within five (5) year period: he / she must apply and show good cause for an extension of the Environmental Authorisation three (3) months prior to its expiry date	Not Applicable	Construction has commenced within the 5-year period.
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.	Compliant	<p>KBC proposed changes to the strategies associated with the initial dewatering of 2A Dam and continued Pit 2A dewatering, whereby:</p> <ul style="list-style-type: none"> • 2A Dam will be dewatered with all water sent to the EWRP, via the ARMS Tank; • Water from the pit will be pumped to the 3A North underground workings or 5 West Void for storage; • Water from the 3A North underground workings or 5 West void, when needed, will be pumped to the Fire Hydrant Dams for re-use in the process; and • Water from the 3A North underground workings or 5 West void will be pumped to the EWRP fortreatment. <p>This forms part of a separate environmental authorisation application that was submitted to the DMR. Further thereto, KBC has applied for a 'Post 2A dam dewatering strategy' with the DWS.</p> <p>Although construction associated with this environmental authorisation was undertaken, such was undertaken as per this approved environmental</p>

			authorisation. The dewatering activities associated with the separate application have not yet commenced.
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.	Noted	The holder of the authorisation is aware of and takes cognisance of this condition. No changes to the details of the holder of the authorisation has occurred as it still remains as 'Anglo American Khwezela: Bokgoni Section'.
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.	Compliant	Hard copies of the environmental authorisation is kept on site at the KBC environmental department offices, whilst soft copies are saved on the Box Platform and Shared Drives.
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.	Noted	The holder of the authorisation is aware of and understands this condition.
8.1.9	After an appeal period has been expired and no good course to extend the appeal period has been submitted in accordance with Chapter 2 of the National Appeal Regulations of 2014, a thirty (30) day-written notice must be given to the Department that the activity will commence. Commencement for purpose for the purpose of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence.	Not Applicable	No proof was provided at the time of the audit confirming that 30-day written notice to the Department prior to the commencement of the activity. The Authorisation was however granted over 3 years ago and the haul road had been constructed with the rest to follow. Previous external audits of this particular condition already raised it as a non-compliance and the Licensee cannot mitigate this finding any further since it is after the fact. For this reason, the finding in this audit is reported as Not Applicable.
8.2 Specific Conditions			
8.2.1 Commissioning of Activities			
8.2.1.1	This Authorisation is hereby solely granted to extend Pit 2A opencast mining operation.	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.1.2	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.	Compliant	<p>All relevant approvals and authorisations have been obtained for the Pit 2A extension project, and include:</p> <ul style="list-style-type: none"> • This environmental authorisation (DMR Ref. No. (MP)30/5/1/1/3/2/2(307)EA); • Environmental Management Programme approval (DMR Ref. No. (MP)30/5/1/1/3/2/2(307)EA); • Water Use Licence (Licence No.: 06/B11F/CGI/7671); and • Post 2A Dam Water Management Strategy (License No.: 30/5/1/2/3/2/1/307 EA of 12 August 2020)
8.2.1.3	The applicant must apply the principle of best practicable environmental option for all	Noted	The holder of the authorisation is aware of and understands this condition.

	technologies used/implemented during mining.		
Pre-Construction Phase			
8.2.1.4	a) The applicant must appoint an independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EMPr and EA (see 8.2.2, Management of the activity for more details),	Not Applicable	Mine personnel indicated that the KBC Environmental Officer has been appointed as the ECO. However, the condition requires the appointment of an independent ECO. The Authorisation was however granted over 3 years ago and the haul road had been constructed with the rest to follow. Previous external audits of this particular condition already raised it as a non-compliance and the Licensee cannot mitigate this finding any further since it is after the fact. For this reason, the finding in this audit is reported as Not Applicable.
	b) The applicant must provide all contractors and sub-contractors with a copy of Environmental Management Programme and Environmental Authorisation prior to the mining activities.	Compliant	Haul Road contractors were provided with copies of the EA and EMPr as these had to form part of the 'Contractor's Pack'.
	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.	Compliant	A compliance assessment to the requirements of the EMPr was undertaken as part of this environmental audit (refer to Section 5.2 above).
	d) In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	Compliant	Current practices at KBC include the provision of PPE to all employees with signage present throughout the mine indicating the minimum PPE required to undertake activities within each specific area.
	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.	Compliant	All current construction activities are reportedly conducted within the KBC mining area, with warning signs around KBC, warning the public of the dangers associated with the mining activities.
	f) 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.	Not Applicable	No soil stripping and stockpiling has yet commenced as part of the Pit 2A extension project. This condition is therefore not yet applicable.
	g) If any soil contamination is noted at any phase of the proposed activity(ies) the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this Department must be informed in this regard.	Compliant	The holder of the authorisation is aware of and understands this condition. An incident had recently occurred where a diesel driven pump had leaked diesel on the Haul Road. Soil was removed and the site remediated. Previous photographic evidence was shared at the time of the audit.
Access Roads & Traffic			
8.2.1.5	a) Necessary signage and traffic measures must be implemented for safe and convenient access to the site from adjacent roads,	Compliant	Photographic evidence confirmed that signage and traffic speed limits have been implemented for safe and convenient access to the site from adjacent roads.

	b) Access roads must be well maintained throughout the mining operation	Not Applicable	Mining activities have commenced with the construction of the Haul road. Access roads are yet to be constructed.
Air Quality Management			
8.2.1.6	a) Proper measures must be put in place to suppress dust in order to minimize nuisance conditions.	Compliant	Photographic evidence confirmed that dust suppression by water bowzers and monthly dust fallout monitoring was undertaken. Such practices will be continued with during the life of the Pit 2A expansion project.
	b) A speed restriction of 40km/h must be enforced and monitored on site for all mine vehicles.	Compliant	KBC implements a speed limit of 40 km/h mine wide with such speed limit also applicable to the Pit 2A extension project area.
Proliferation of Alien Species			
8.2.1.7	a) All construction/mining equipment and vehicles must be cleaned when leaving the site to reduce the chances of spreading weeds and invasive species,	Compliant	It was explained that the construction equipment is limited to mining equipment that do not leave site until decommissioning or in the event that such equipment becomes redundant, where after it is sent to the salvage yard or erection yard for re-sale. Mining equipment and vehicles are regularly washed at the various washbays (EMV washbay, LDV washbay and Diesel workshop washbay).
Noise			
8.1.2.8	a) Construction/ mining activities must be limited to normal working hours (7h00-17h00)	Compliant	It was confirmed by mine personnel that the movement of construction vehicles is limited to daylight hours.
	b) Mine vehicles must be fitted with standard silencers prior to beginning of construction.	Compliant	KBC's mining fleet is fitted with silencers and mufflers with such practice continuing during the Pit 2A extension project.
Erosion Control Measures			
8.2.1.9	a) All soil surfaces compacted as a result of mining/construction activities must be ripped and imported materials must be removed.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road was completed. Office containers that were placed on site for the construction of the road are still on site as they will be utilised for future mining work. Hard surfaces under these therefore remain at present. This condition is not yet applicable.
	b) Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition.	Compliant	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road has commenced. This condition is not yet applicable.
Excavation Activities			
8.2.1.10	a) Topsoil must be stripped and stockpiled prior to excavation in a designated area.	Not Applicable	No topsoil stockpiles have been created as part of the Pit 2A extension project. This condition is not yet applicable.

	b) Under no circumstances should material stockpiles be disposed of outside the boundary of the mine area.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. Construction of a haul road has commenced. This condition is not yet applicable.
Waste Management			
8.2.1.11	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.	Not Applicable	No general waste associated with the Pit 2A extension project has been generated. This condition is not yet applicable.
	b) No waste must be disposed of through burying and burning.	Compliant	It was reported that the burning of waste is strictly prohibited at the mine.
	c) All hazardous waste must be disposed of at an official registered site, or be removed by registered hazardous waste contractors.	Not Applicable	No hazardous waste associated with the Pit 2A extension project has been generated. This condition is not yet applicable.
	d) An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillage etc) that occur on site must be developed,	Compliant	KBC has developed and implemented the mine wide <i>Khwezela Emergency Preparedness Procedure (AATC010464)</i> .
Surface and Groundwater Contamination must be prevented and/or mitigated by implementation of the following conditions			
8.2.1.12	a) Specific area must be demarcated for fuelling and workshop services. And such area must be bunded to reduce the possibility of soil and water contamination.	Compliant	The KBC mining fleet is currently serviced at the designated workshop areas and similarly, re-fuelling is only undertaken at the designated re-fuelling bays. This practice will be continued for the Pit 2A extension project.
	b) Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.	Compliant	Current practices at KBC ensure that once a spillage is identified, the activity is ceased, and clean-up thereof is commenced immediately. This practice will be continued during the Pit 2A extension project.
	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.	Compliant	Current practices at KBC ensure that once a spillage is identified, the activity is ceased, and clean-up thereof is commenced immediately. This practice will be continued during the Pit 2A extension project. KBC does not undertake bio-remediation but rather disposes of the contaminated soils as hazardous waste.
	d) Untreated sewage water must not be discharged directly into the natural environment.	Compliant	The existing Sewage Treatment Plant will be utilised during the Pit 2A extension project. The treated effluent therefrom is discharged into the Plant Return Water Dam. No untreated sewage is discharged to the natural environment.
Fire Prevention and Management			
8.2.1.13	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.	Compliant	Fire extinguishers are available at strategic locations across the mine. Further thereto, KBC also has a fire team that is located next to the salvage yard, along with all firefighting equipment.
	b) Workers must be adequately trained in the handling of firefighting equipment.	Compliant	All employees are trained on the use of firefighting equipment. Further thereto,

			KBC also has a fire team that is located next to the salvage yard, along with all firefighting equipment.
	c) Open fires must strictly be prohibited.	Compliant	Open fires are prohibited at KBC, with fires for cooking only allowed within designated areas.
	d) Smoking must be prohibited in the vicinity of flammable substances.	Compliant	Smoking is prohibited in the vicinity of flammable substances, with signage indicating such observed. Smoking is also only allowed within designated areas.
	e) Cooking and heating fires must be permitted only in designated areas with appropriate safety measures.	Compliant	As described above, open fires are prohibited at KBC, with fires for cooking only allowed within designated areas.
Stormwater Management			
8.2.1.14	a) Storm water management plan must be developed, and implemented on site.	Compliant	A recent storm water management plan, <i>Partial update of stormwater management plan and mine water balance</i> by Golder Associates was developed in 2020 and dated 23 February 2021. All clean surface runoff is directed away from the current plant pollution control dams via berms and trenches. As previously described, only the construction of the haul road had commenced and was completed by the time of the audit. As per the storm water management plan the haul road and associated berms are acting as part of the storm water management infrastructure.
Safety			
8.2.1.15	a) Potentially hazardous area must be demarcated with danger tape.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This condition is not yet applicable as no hazardous areas are yet applicable.
	b) Appropriate signage must be placed to caution employees and contractors not to attempt to enter certain structures without being authorised.	Compliant	Site observations show that signage has been erected at the offices, workshops and at the entrance of the mining areas. Radios are also utilised to communicate with the contractors / operators to enter areas.
Emergency Response Plan			
8.2.1.16	a) An Emergency Response Plan should be available for accidental spills and firefighting during both construction and operation of the project.	Compliant	Refer to discussions under condition 8.2.1.11 (d) with regards to the development and implementation of the <i>Khwezela Emergency Preparedness Procedure (AATC010464)</i> .
	b) In the event of emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area,	Noted	The holder of the authorisation is aware of and understands this condition. No emergency events have taken place.
	c) All significant pollution incidents must be reported to this Department within forty eight (48) hours of occurrences.	Noted	The holder of the authorisation is aware of and understands this condition. No emergency events have taken place.
Compliance with Legislation			

8.2.1.17	a) The National Environmental Management Act, 1998 (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said Act.	Compliant	Current practices include conducting internal site inspections, internal audits as well as biennial external environmental legal compliance audits to ensure compliance to the applicable legislation. Annual external audits on the compliance to the respective authorisations (such as this) and licence are also undertaken with the reports thereof submitted to the relevant authorities.
	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.	Compliant	
	c) The National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by prospecting activities, into the atmosphere.	Compliant	
	d) The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.	Compliant	
	e) The National Heritage Resources Act, 1999 (Act 25 of 1999), with particular reference to the protection of all historical and pre-historical cultural remains.	Compliant	
	f) The Mine Health and Safety Act, 1996 (Act 29 of 1996) in conjunction with the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), with particular reference to those sections and regulations pertaining to health and safety at mines; mining within 100 m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.	Compliant	
	g) All provisions of the Occupational Health and Safety Act, 1993 (Act 85 of 1993) and any other applicable legislation must be adhered to by the holder of this Authorisation.	Compliant	
	h) The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008).	Compliant	
Liability of the Holder of the Authorisation			
8.2.1.18	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.	Noted	The holder of the authorisation is aware of and understands this condition.
	b) Any complaint from the public during the life of mine must be attended to by the holder of this Authorisation as soon as possible to the satisfaction of parties concerned.	Compliant	The holder of the authorisation is aware of and understands this condition. KBC has implemented a complaint register. Should a complaint be received, such is logged as an incident on the Enablon system for investigation, correction and close-out.
	c) The contractor must ensure that serviceable ablution facilities are available for	Not Applicable	Existing ablution facilities, serviced by the Bokgoni Sewage Treatment Plant,

	employees. It is the responsibility of the holder of the Authorisation to see to it that this condition is adhered to.		will be utilised.
Management of the Activitiy			
8.2.2	a) A copy of an Environmental Authorisation and Environmental Management Programme 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.	Compliant	The environmental authorisation and Environmental Management Programme hard copies are kept on site at the KBC environmental department offices, whilst soft copies are kept on Box folders and Shared folders for users to access.
	b) The Environmental Management Programme prepared by Shangoni Management Services (Pty) Ltd (attached to the EIA Report) must be adhered to during the life of the mine.	Noted	The holder of the authorisation is aware of and understands this condition.
	c) All duties and responsibilities as outlined in the Environmental Management Programme attached are binding throughout the life of the mine.	Noted	The holder of the authorisation is aware of and understands this condition.
	d) Any proposed amendments to the Environmental Management Programme (as a result of this authorisation or otherwise) must be submitted in writing to this Department for approval prior to the amendment being implemented. On approval of the proposed amendment the EMP must be accordingly amended and adhered to.	Noted	The holder of the authorisation is aware of and understands this condition. As previously described, KBC is proposing changes to the strategies associated with the initial dewatering of 2A Dam and continued Pit 2A, for which environmental authorisation, a waste management licence and a water use licence are required.
Appointment of Environmental Control Officer			
8.2.3	a) An Environmental Control Officer must be appointed, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the Environmental Authorisation and Environmental Management Programme, prior to any commencement of mining activities on site.	Not Applicable	Mine personnel indicated that the KBC Environmental Officer has been appointed as the ECO. However, the condition requires the appointment of an independent ECO. The Authorisation was however granted over 3 years ago and the haul road had been constructed with the rest to follow. The Licensee cannot mitigate this finding any further since it is after the fact. The finding is therefore reported as Not Applicable.
	b) The Environment Control Officer appointed must monitor the construction of the infrastructure to ensure that the layout plans are in accordance to the designs and record important findings of the site inspection.	Compliant	The KBC Environmental Officer is responsible for ensuring compliance through the monthly EMS inspections. Any concerns identified would be loaded onto the EMS tracking system known as Enablon for investigation, actioning and close-out.
	c) The Environment Control Officer must also monitor the implementation of specific elements of the Environmental Management Programme by contractors.	Compliant	
	d) All duties and responsibilities as outlined in the Environmental Management Programme attached are binding throughout the life of mine.	Noted	The holder of the authorisation is aware of and understands this condition.
Site Closure and Decommissioning			

8.2.4	a) 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 the EMPr.	Not Applicable	Mining activities have not yet commenced at the Pit 2A extension project. This condition is not yet applicable.
	b) 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, 2002 (Act 28 of 2002), as amended.	Not Applicable	
	c) All mitigation measures for the decommissioning phase, as outlined in the EA. The holder of EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment: cancellation, cessation, relinquishment and completion of the operation.	Not Applicable	
Monitoring			
8.3	a) This Department reserves the right to monitor and audit the activity to ensure compliance with legislation and the conditions stipulated in this authorisation.	Noted	The holder of the authorisation is aware of and understands this condition.
	b) 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.	Compliant	Current practices include conducting internal site inspections, internal audits as well as annual external environmental legal compliance audits to ensure compliance to the applicable legislation. Annual external audits on the compliance to the respective authorisations and licence are also undertaken with the reports thereof submitted to the relevant authorities.
Recording and reporting to the Department			
8.4	The authorization holder must submit annually an environmental audit report during the operation of the activity, unless otherwise requested by the department. The audit report must convey the following:	Compliant	This environmental audit is the fifth audit to be undertaken on the environmental authorisation and environmental management programme for the Pit 2A extension project. Proof of submission to the DMR of the last audit report is a submission letter dated 10 December 2020 with the Dept stamp and reference number noted as: DMRE/MPU/LG/13702.
	a) The date in which the audit was carried out,	Compliant	Dates of when the audits were conducted are clearly defined in the audit reports.
	b) The outcome of the audit, in relation to the conditions stipulated in the environmental authorization and the EMPr as well as the actions taken to mitigate environmental impacts on site	Compliant	The outcome of the audit as well as recommendations and actions are provided within the environmental audit reports.
	c) Records of monitoring and / or auditing must be made available for inspection to this Department and any other relevant authority inspecting the development activities.	Noted	The holder of the authorisation is aware of and understands this condition.
	d) 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	Noted	

	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.		
	e) 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.	Noted	
Non-Compliance			
8.5	a) In the event of non-compliance by any contractor during the mining/construction the authorised activity, the holder of this Authorisation will be liable.	Noted	The holder of the authorisation is aware of and understands this condition.
	b) The holder shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.		
	c) 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.		
	d) 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.		

7.6 LANDAU III MINE RESIDUE DEPOT – ENVIRONMENTAL AUTHORISATION GRANTED 28 MARCH 2018 DMR REF.: MP 30/5/1/2/3/2/1/307 EM

CONDITION NO	CONDITION	FINDINGS	OBSERVATIONS/AUDIT EVIDENCE
8.1 STANDARD CONDITIONS			
8.1.1	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.	Noted	The holder of the authorisation is aware of and understands this condition.
8.1.2	The holder of the authorisation must ensure compliance with these 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.	Compliant	The environmental coordinator is responsible for implementing the conditions of the authorisation. The general mine manager is the overall responsible individual for the mine.
8.1.3	Any changes to, or deviations from, the project description set out in this authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations.	Compliant	No deviations or changes from the project description apply.
8.1.4	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.	Noted	The holder of the authorisation is aware of and understands this condition.
8.1.5	A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.	Compliant	It was reported that that a copy of the Environmental Authorisation is kept on site at the Environmental Department and can be requested from the Environmental Co-ordinator at any time. Soft copies of the EA is also kept on Box and Q-drive folders for access by employees.
8.1.6	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.	Noted	The holder of the authorisation is aware of and understands this condition. As part of the activities associated with the reclamation of Landau III MRD, a General Authorisation ("GA") has been obtained with Licence Number: 27/2/2/B11G/258 and the Environmental Management Programme in terms of the MPRDA and NEMA have been approved by the DMR.
8.1.7	After an appeal period has been expired and no good course to extent the appeal period has been submitted in accordance with Chapter 2 of the National Appeal	Compliant	On 6 February 2018 the DMR was informed of the planned commencement of the Landau III MRD Reclamation Project on 5 March 2018 in accordance with the

	Regulations of 2014, a thirty (30) day-written notice must be given to the Department that the activity will commence. Commencement for the purpose for the purpose of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence.		aforesaid condition. In terms of the notification letter the appeal period expired on 25 January 2018.
8.2 SPECIFIC CONDITIONS			
8.2.1 Commissioning of the Activity			
8.2.1.1	This authorisation is hereby solely granted to reclaim their Landau III Mine Residue Deposit, relocation of three 40kv power lines and expansion of the existing road.	Noted	The holder of the authorisation is aware of and understands this condition. The reclamation of Landau III MRD and the expansion of the existing road has commenced. The relocation of three existing power lines has been completed.
8.2.1.2	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.	Noted	The holder of the authorisation is aware of and understands this condition. All the necessary permits/licence/approvals and/or service agreements have been obtained. The EMPr was approved in March 2018 by the DMR. A GA has also been obtained with Licence Number: 27/2/2/B11G/258 from the Department of Water and Sanitation ("DWS").
8.2.1.4	Preconstruction Phase		
	The applicant must appoint an Independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EMPr and EA (see 8.2.2. Management of the activity for more details).	Compliant	An Environmental Control Officer that is responsible for the monitoring and reporting on compliance with the conditions of the environmental authorisation as well as monitoring and reporting on the implementation of the approved EMPr was appointed. The ECO responsible for monitoring and reporting on compliance was from the NTC Group.
	The applicant must provide all contractors and sub-contractors with a copy of Environmental Management Programme and Environmental Authorisation prior to the mining activities.	Compliant	All contractors and sub-contractors have been provided with a copy of the EMPr and Environmental Authorisation. According to mine personnel, the EA and EMPr are provided to contractors and sub-contractors prior to the mining activities. These documents have to form part of their 'Contractor's Pack'.
	All pre-construction mitigation measures as outlined in the Environmental Management Programme attached in Environmental Impact Assessment report must be adhered to at all times.	Not Applicable	The project was beyond construction phase and therefore, compliance to pre-construction mitigation measures as outlined in the EMPr are no longer applicable.
	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	Compliant	All employees of KBC are provided with and required to wear the necessary PPE – including face masks to curb the spread of the Covid-19 pandemic.
	Appropriate notification signs must be erected at the construction site, warning the public (resident, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.	Compliant	Photographic evidence showed that notification and warning signs are located throughout the boundary of Landau III, warning the public about the hazards around the construction site and presence of heavy vehicles and machinery. Flagmen have also been stationed on the roads leading to the construction site. A traffic management plan has been developed to ensure that heavy vehicles leaving the site do not pose as a risk to motorists.
	Construction areas (e.g. material laydown areas), topsoil and subsoil must be	Compliant	Construction materials have not been stockpiled in the wetlands. Previous material

	protected from contamination or pollution. Stockpiling must not take place in drainage line or areas where it will impede surface water runoff.		encroaching in the wetland had been removed.
	If any soil contamination is noted at any phase of the proposed activity(ies), the contaminated soil must be removed to a licence waste disposal facility and the site must be rehabilitated to the satisfaction of the Department 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.	Compliant	KBC has developed and implemented procedures guiding the management of spillages associated with hydrocarbons. The following procedure applies: <ul style="list-style-type: none"> • <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026497).</i>
8.2.1.5	Access road and traffic impact		
	Necessary signage and traffic measures must be implemented for safe and convenient access to the site from adjacent roads.	Compliant	Refer to discussion under Condition 8.2.1.4 (e) above for a discussion regarding the necessary signage and traffic measures.
	Access roads must be well maintained through the mining operations.	Compliant	Photographic evidence showed that roads are well maintained.
8.2.1.6	Air Quality Management		
	Proposer measures must be put in place to suppress dust in order to minimise nuisance conditions.	Compliant	Dust suppression is being implemented at the Landau III project area. Mine personnel confirmed that Dust-a-side dust suppressant additive is being utilised.
	A speed restriction of 40km/h must be enforced and monitored on site for all mine vehicles.	Compliant	A vehicle tracking system known as Trysome is in place to track the speed of all mine vehicles. The system is connected to a GPS that assigns speed limits (either mine speed limits (internal) or national speed limits (national road network)). The information gathered from each vehicle is then stored on a central database whereby data can be pulled to assess each vehicles conformance. One such sample record of 23 July 2020 was verified during the previous audit.
8.2.1.7	All construction/mining equipment and vehicles must be cleaned when leaving the site to reduce the chances of spreading weeds and invasive species.	Compliant	Construction/mining equipment is regularly cleaned. Construction and mining vehicles are restricted to movement within the construction and mining areas and do not leave these mining areas. Construction and mining equipment are restricted to moving within designated roads within the mine boundary, thus, reducing the chances of spreading weeds and invasive species.
8.2.1.8	Noise		
	Construction/mining activities must be limited to normal working hours (6h00 – 18h00)	Compliant	It was confirmed by mine personnel that construction/mining activities are restricted to shifts that remain within 6h00 – 18h00.
	Mine vehicles must be fitted with standard silencers prior to beginning of construction	Compliant	All machinery and vehicles employed at KBC are fitted with standard exhaust systems and are maintained in a good state of repair. The Anglo American policy ensures that all new and replacement equipment and vehicles are in line with standards and legislative requirements and further incorporate emission-reduction technology.

8.2.1.9	Erosion Control Measures		
	All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed.	Compliant	Areas compacted as reportedly ripped and imported materials have been removed.
	Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition.	Compliant	Photographic evidence provided does not indicate erosion channels were developed.
8.2.10	Excavation Activities		
	Topsoil must be stripped and stockpiled prior to excavation in a designated area.	Compliant	It was explained that topsoil from the MRD has been stockpiled for use during the rehabilitation phase in an area between the Landau III MRD and the Landau Hostel Waste Water Treatment Works. The topsoil stockpile area has been placed in an area that will not be disturbed during the operational phase. The topsoil stockpile is not located within 50 m of any watercourses.
	Under no circumstances should material stockpiles be disposed of outside the boundary of the mine.	Compliant	Stockpiles are located within the mine boundary.
8.2.11	Waste Management		
	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 or waste is allowed on site.	Compliant	Photographic evidence showed that general waste is contained in bins that are wind and scavenger proof. General waste is removed by external waste service providers to the eMalahleni Municipal Landfill.
	Storage of domestic and hazardous waste to be undertaken within a designated waste storage facility.		
	No waste must be disposed of through burying and burning.	Compliant	No waste is permitted to be disposed of or buried on site and no concerns in this regard were identified during the site inspection. All waste on site is managed in accordance to the <i>Khwezela Waste Management Procedure (AATC026501)</i> . All general waste is stored in demarcated bins and removed by an external waste service provider to the eMalahleni Local Municipal landfill. Used fluorescent lights are removed by Badan Energy (Pty) Ltd (eWaste Africa) for recycling. Oil is recycled by eMalahleni Oil.
	All hazardous waste must be disposed of at an official registered site, or be removed by registered hazardous waste contractors.	Compliant	Hazardous waste is removed by Phambili Services Pty Ltd and disposed of at Holfontein that is an officially registered site. Safe disposal certificates are retained.
	An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillages etc.) that occur on site must be developed.	Compliant	Refer to discussion under Condition 8.2.1.4 (g) above for a discussion regarding the emergency response and preparedness plan.
	Excavate and dispose contaminated soil mass beneath the MRD in accordance with the NEMWA regulations for contaminated Waste.	Not Applicable	The MRD is still in the process of being re-mined with this condition currently not yet applicable. Mine personnel confirmed that the contaminated soil mass beneath the MRD will be excavated and disposed of, in accordance with the waste management license for hazardous waste (contaminated soil) issued in terms of NEMWA, once the MRD material has been removed.

	Soil must be managed in line with the requirements of the national norms and standards for the remediation of contaminated land and soil quality	Noted	The holder of the authorisation is aware of and understands this condition. Should KBC come across contaminated soil, the soil will be managed in line with the requirements of the national norms and standards for the remediation of contaminated land and soil quality.
8.2.1.12	Surface and groundwater contamination must be prevented and/or mitigated by the implementation of the following conditions		
	Specific area must be demarcated for fuelling and workshop services. And such area must be bunded to reduce the possibility of soil and water contamination	Compliant	A hard park was established. It includes a workshop for vehicle and plant services.
	Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.	Compliant	Spills are cleared and remediated as per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026947)</i> that details correct spill handling methods.
	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 onsite.	Compliant	KBC does not undertake bio-remediation but rather disposes of the contaminated soils as hazardous waste at a permitted hazardous waste disposal facility.
	Untreated sewage water must not be discharged directly into the natural environment.	Compliant	Untreated sewage is reportedly not being directly discharged into the natural environment – instead, it is piped to the Matimba Village Sewage Plant. There are portable toilets on site for construction workers and these are serviced weekly
8.2.1.13	Fire prevention and management		
	Fire extinguishers that are in good working conditions must be made available at all times for their usage during the occurrence of accidental fires.	Compliant	It was reported that fire extinguishers that are in good working order and are available on site for use in the event of a fire.
	Workers must be adequately trained in the handling of firefighting equipment.	Compliant	All employees are trained on the use of firefighting equipment. Further thereto, KBC also has a fire team that is located next to the salvage yard, along with all firefighting equipment.
	Open fires must strictly be prohibited.	Compliant	No open fires are allowed on site.
8.2.1.14	Storm water management		
	Storm water management plan must be developed, and implemented on site.	Compliant	A recent storm water management plan, <i>Partial update of stormwater management plan and mine water balance</i> by Golder Associates was developed in 2020 and dated 23 February 2021. All clean surface runoff is directed away from the current plant pollution control dams via berms and trenches. As previously described, only the construction of the haul road had commenced and was completed by the time of the audit. As per the storm water management plan the haul road and associated berms are acting as part of the storm water management infrastructure.
8.2.1.15	Safety		

	Potentially hazardous area must be demarcated with danger tape.	Compliant	Hazardous areas have been demarcated with danger tape, and signage has been placed to caution employees and contractors not to attempt to enter certain areas.
	Appropriate signage must be placed to caution employees and contractors not to attempt to enter certain structures without being authorised.		
8.2.1.16	Emergency Response Plan		
	An Emergency Response Plan should be available for accidental spills and firefighting during both construction and operation of the project.	Compliant	An emergency response procedure has been developed for accidental spills and firefighting during construction and operation of the project, as per the <i>Khwezela Emergency Preparedness Procedure (AACT010464)</i> .
	In the event of an emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area.	Noted	The holder of the authorisation is aware of and understands this condition. The holder of the authorisation will notify the department within 24hrs and contact the relevant emergency services in the area. It was reported that no major emergency has occurred.
	All significant pollution incidents must be reported to this Department within forth eight (48) hours of occurrences.	Noted	The holder of the authorisation is aware of and understands this condition. The holder of the authorisation will report the incident to the department within 48 hrs and contact the relevant emergency services in the area.
	An emergency response contingency plan should be implemented to address clean up measures for soil contamination should spill or leak occur.	Compliant	Spills are cleared and remediated as per the <i>Khwezela Hydrocarbon and Chemical Handling Procedure (AATC026947)</i> .
8.2.1.17	Compliance with other legislation		
	The National Environmental Management Act, 1998 (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said act.	Noted	The holder of the authorisation is aware of and understands this condition. Internal environmental legal compliance audits are conducted biennially and external legal compliance audits are conducted annually to audit/verify compliance against the legislation.
	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.		
	The National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by prospecting activities, into the atmosphere.		
	The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.		
	The National Heritage Resources Act, 1999 (Act 25 of 1999), with particular reference to the protection of all historical and pre-historical cultural remains.		
	The Mine Health and Safety Act, 1996 (Act 29 of 1996) in conjunction with the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), with particular reference to those sections and regulations pertaining to health and safety at mines; mining within 100m from structures that must be protected; as well as those sections		

	pertaining to rehabilitation of the surface.		
	All provisions of the Occupational Health and Safety Act, 1993 (Act 85 of 1993) and any other applicable legislation must be adhered to by the holder of this Authorisation.		
	The National Environmental Management: Waste Act, 2008 (Act 59 of 2008)		
8.2.1.18	Liability of the Holder of this Authorisation		
	The competent authority shall not be held responsible for any damages or losses suffered by the holder of 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 conditions unless otherwise specified.	Noted	The holder of the authorisation is aware of and understands this condition.
	Any complaint from the public during the life of mine must be attended by the holder of the Authorisation as soon as possible to the satisfaction of parties concerned.	Compliant	KBC has implemented a complaint's register whereby all complaints received are recorded actioned and closed out. Should a complaint be received, such will be investigated to determine if it is as a result of mine activities. KBC will then enter into consultations with the affected party. This register applies to the whole of Khwezela.
	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.	Compliant	It was reported that serviceable ablution facilities are available to employees of the contractor. The ablution facilities are serviced weekly.
8.2 MANAGEMENT OF ACTIVITY			
8.2.2	A copy of the Environmental Authorisation and Environmental Management Programme must be always available on site so as to monitor compliance with conditions outlined in both the documents. Both documents must be used as on-site reference documents during the life of mine.	Compliant	A copy of the Environmental Authorisation is kept on site at the Environmental Department and can be requested from the Environmental Co-ordinator at any time.
	The Environmental Management Programme prepared by SRK Consulting (Pty) Ltd (attached to the EIA Report) must be adhered to during the life of mine.	Noted	An assessment on the compliance to the provisions of the EMP is included in Chapter 5.3 above.
	All duties and responsibilities as outlined in the Environmental Management Programme attached are binding throughout the life of mine.	Noted	The holder of the authorisation is aware of and understands this condition.
	Any proposed amendments to the Environmental Management Programme (as a result of this authorisation or otherwise) must be submitted in writing to this Department for approval prior to the amendment being implemented. On approval of the proposed amendment the EMP must be accordingly amended and adhered to	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.3	Appointment of Environmental Control Officer		

	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.	Compliant	The NTC group was appointed as the ECO to monitor and ensure compliance and implementation of all mitigation measures and provisions in the EA and EMPr, prior to commencement of activities at Landau III MRD.
	The Environmental Control Officer appointed must monitor the construction of the infrastructure to ensure that the layout places are in accordance to the designs and record important findings of the site inspection.	Compliant	The appointed ECO monitored the construction of infrastructure to ensure that the layout places are in accordance with the designs as well as monitors the implementation of specific elements of the EMPr by contractors. Details in this regard are recorded with monthly reports submitted to KBC.
	The Environmental Control Officer must also monitor the implementation of specific elements of the Environmental Management Programme by contractors.		
	All duties and responsibilities as outlined in the Environmental Management Programme attached are binding throughout the life of mine.	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.4	Site Closure and Decommissioning		
	The commissioning and decommissioning of individual activities within the overall listed mining activity must take place within the phases and timeframes as set out in the EMPr.	Noted	The holder of the authorisation is aware of and understands this condition. The commissioning activities are taking place and are scheduled to take place as per the timeframes set out in the EMPr.
	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, 2002 (Act 28 of 2002), as amended.	Noted	The holder of the authorisation is aware of and understands this condition.
	All mitigation measures for the decommissioning phase, as outlined in the EA. The holder of the EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of the operation.	Noted	The holder of the authorisation is aware of and understands this condition.
8.3 MONITORING			
	This Department reserves the right to monitor and audit the activity to ensure compliance with legislation and the conditions stipulated in this authorisation.	Noted	The holder of the authorisation is aware of and understands this condition.
	It is the holder of the Authorisation's responsibility to ensure that an ongoing management and monitoring of the impacts of the activity on the environment throughout the life of mine is put into practice.	Noted	The holder of the authorisation is aware of and understands this condition.
8.4 RECORDING AND REPORTING TO THE DEPARTMENT			
	The authorisation holder must submit annual an environmental audit report during the operation of the activity, unless otherwise requested by the Department. The audit report must convey the following:		

	The date which the audit was carried out.	Compliant	This report is the fifth annual audit report that is being compiled for this EA. This report indicates the date on which the audit was carried out and the outcome of the audit in relation to conditions stipulated in the EA and EMPr.
	The outcome of the audit, in relation to the conditions stipulated in the environmental authorization and the EMPr as well as the actions taken to mitigate environmental impacts on site.		The holder of the authorisation is aware of and understands this condition. Records of monitoring and/or auditing will be made available to the Department and any other relevant authority inspecting the development activities upon request.
	Records of monitoring and/or auditing must be made available for inspection to this Department and any other relevant authority inspecting the development activities.	Noted	The holder of the authorisation is aware of and understands this condition. Records relating to compliance and non-compliance with the conditions of this authorisation are kept on file by the environmental co-ordinator. Records will be made available to the Department within seven days of receipt of a written request by the Department. Environmental Compliance will further be monitored through complaints received from the public.
	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.	Noted	The holder of the authorisation is aware of and understands this condition. All records relating to the implementation of the EMPr are kept in the office by the environmental co-ordinator where it is safe and is retrievable.
	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.	Noted	The holder of the authorisation is aware of and understands this condition. Records of monitoring and/or auditing will be made available to the Department and any other relevant authority inspecting the development activities upon request.
8.5 NON-COMPLIANCE			
	In the event of non-compliance by any contractor during the mining/construction the authorised activity, the holder of this Authorisation will be liable.	Noted	The holder of the authorisation is aware of and understands this condition.
	The holder shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	Noted	The holder of the authorisation is aware of and understands this condition.
	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.		
	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.	Noted	The holder of the authorisation is aware of and understands this condition.
9. APPEAL OF AUTHORISATION			
	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. The notification must -		
	Specify the date which the authorisation was issued.	Compliant	A copy of a newspaper advertisement / notification that was published is retained for record. It was placed in the Witbank News on Friday 5 January 2018 in 2 official
	Inform the registered interested and affected parties of the appeal procedure		

	provided for in Chapter 2 of the National Appeal Regulations of 2014.		languages and it complies with the requirements of the aforesaid condition.
	Advise the interested and affected parties that a copy of the authorisation and reasons for the decision will be furnished on request.		
	An appeal against the decision must be lodged in terms of Chapter 2 of the National Appeals Regulations of 2014.		

7.7 LANDAU III MINE RESIDUE DEPOSIT BORROW PIT – ENVIRONMENTAL AUTHORISATION GRANTED 10 JULY 2018, DMR REF: MP30/5/1/3/3/2/1/(11666)EM

CONDITION NO	CONDITION	FINDINGS	OBSERVATIONS/AUDIT EVIDENCE
8. CONDITIONS			
8.1 STANDARD CONDITIONS			
8.1.1	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.	Noted	The holder of the authorisation is aware of and understands this condition.
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.	Noted	The holder of the authorisation is aware of and understands this condition.
8.1.3	The activity which is authorised may only be carried out at the property indicated above (Point B: 2)	Not Applicable	The activities associated with this EA have not yet commenced. Accordingly, a “Not applicable” finding is recorded.
8.1.4	Any changes to, or deviations from, the project description set out in this Authorisation must be approved, in writing, by the Department before such changes or deviations may be 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.	Not Applicable	The activities associated with this EA have not yet commenced. Accordingly, a “Not applicable” finding is recorded.
8.1.5	This Environmental Authorisation 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 EA without a valid mining permit	Noted	
8.1.6	Where any of the applicant's contact details change, including the name of the	Not Applicable	No changes to the applicant's details have occurred since the approval of this EA.

	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.		
8.1.7	A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.	Compliant	A copy of this EA and the associated BAR are kept at the KBC Environmental Department as well as on the KBC shared network – this was verified by shared screens during the virtual audit.
8.1.8	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.	Noted	The holder of the authorisation is aware of and understands this condition.
8.1.9	After an appeal period has been expired and no good course to extent the appeal period has been submitted in accordance with Chapter 2 of the National Appeal Regulations of 2014, a thirty (30) day-written notice must be given to the Department that the activity will commence. Commencement for the purpose for the purpose of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence.	Not Applicable	The activities associated with this EA have not yet commenced.
8.2 SPECIFIC CONDITIONS			
8.2.1 Commissioning of the Activity			
8.2.1.1	This authorisation is hereby solely granted to reclaim their Landau III Mine Residue Deposit, relocation of three 40kv power lines and expansion of the existing road	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.1.2	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.	Not Applicable	The activities associated with this EA have not yet commenced.
8.2.1.8	The applicant must apply the principle of best practicable environmental option for all technologies used/implemented during mining.	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.1.9	Preconstruction Phase		
a.	The applicant must appoint an Independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EMPr and EA (see 8.2.2. Management of the activity for more details).	Not Applicable	The activities associated with this EA have not yet commenced. Accordingly, a “Not applicable” finding is recorded.
b.	The applicant must provide all contractors and sub-contractors with a copy of Environmental Management Programme and Environmental Authorisation prior to the mining activities.		

c.	All pre-construction phase mitigation measures as outlined in the Environmental Management Programme (EMPr) attached in the Basic Assessment Report (BAR) must be adhered to at all times.	Not Applicable	The activities associated with this EA have not yet commenced.
d.	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).		
e.	Appropriate notification signs must be erected at the construction site, warning the public (resident, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.		
f.	If any soil contamination is noted at any phase of the proposed activity(ies), the contaminated soil must be removed to a licence waste disposal facility and the site must be rehabilitated to the satisfaction of the Department 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.		
8.2.1.10	Access road and traffic impact		
a.	Necessary signage and traffic measures must be implemented for safe and convenient access to the site from adjacent roads.	Not Applicable	The activities associated with this EA have not yet commenced.
b.	Access roads must be well maintained through the mining operations.		
8.2.1.11	Air Quality Management		
a.	Proposer measures must be put in place to suppress dust in order to minimise nuisance conditions.	Not Applicable	The activities associated with this EA have not yet commenced.
b.	A speed restriction of 40km/h must be enforced and monitored on site for all mine vehicles.		
8.2.1.12	Proliferation of alien species		
a.	All construction/mining equipment and vehicles must be cleaned when leaving the site to reduce the chances of spreading weeds and invasive species.	Not Applicable	The activities associated with this EA have not yet commenced.
8.2.1.13	Noise		
a.	Mining activities must be limited to normal working hours (7h00 – 17h00)	Not Applicable	The activities associated with this EA have not yet commenced.
8.2.1.14	Erosion Control Measures		
a.	All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed.	Not Applicable	The activities associated with this EA have not yet commenced.

b.	Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition.		
8.2.1.15	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 or waste is allowed on site.	Not Applicable	The activities associated with this EA have not yet commenced.
b.	No waste must be disposed of through burying and burning.		
c.	An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillages etc.) that occur on site must be developed.		
8.2.1.16	Surface and groundwater contamination must be prevented and/or mitigated by the implementation of the following conditions		
a.	Specific area must be demarcated for fuelling and workshop services. And such area must be bunded to reduce the possibility of soil and water contamination	Not Applicable	The activities associated with this EA have not yet commenced.
b.	Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.		
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 onsite.		
8.2.1.17	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.	Not Applicable	The activities associated with this EA have not yet commenced.
b.	Workers must be adequately trained in the handling of firefighting equipment.		
c.	Open fires must strictly be prohibited.		
d.	Smoking must be prohibited in the vicinity of flammable substances.		
e.	Cooking and heating fires must be permitted only in designated areas with appropriate safety measures.		
8.2.1.18	Safety		
a.	Potentially hazardous area must be demarcated with danger tape.	Not Applicable	The activities associated with this EA have not yet commenced.
b.	Appropriate signage must be placed to caution employees and contractors not to		

	attempt to enter certain structures without being authorised.		
8.2.1.19	Emergency Response Plan	Not Applicable	The activities associated with this EA have not yet commenced. Accordingly, a “Not applicable” finding is recorded.
a.	An Emergency Response Plan should be available for accidental spills and firefighting during both construction and operation of the project.		
b.	In the event of an emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area.		
c.	All significant pollution incidents must be reported to this Department within forth eight (48) hours of occurrences.		
8.2.1.20	Compliance with other legislation		
a.	The National Water Act, 1998 (Act 36 of 1998), with particular reference to the sections pertaining to mining in the proximity of dams and their catchments areas, rivers, marshes, streams, pans and other water courses	Not Applicable	The activities associated with this EA have not yet commenced.
b.	The Environmental Conservation Act, 1989 (Act 73 of 1989) with particular reference to the requirements of section 20 of the above-mentioned Act,		
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.		
d.	The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.		
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.		
f.	The Mine Health and Safety Act, 1996 (Act 29 of 1996) in conjunction with the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), with particular reference to those sections and regulations pertaining to health and safety at mines; mining within 100 m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.		
g.	The National Environmental Management Act, 1998 (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said Act.		
h.	Firebreaks should be established in terms of the requirements and conditions of the National Veld and Forest Fires Act, 1998 (Act No. 101 of 1998).		
i.	All provisions of the Occupational Health and Safety Act, 1993 (Act No.85 of 1993) and any other applicable legislation must be adhered to by the holder of this Authorisation.		

8.2.1.21	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 of 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 conditions unless otherwise specified.	Noted	The holder of the authorisation is aware of and understands this condition.
b.	Any complaint from the public during the life of mine must be attended by the holder of the Authorisation as soon as possible to the satisfaction of parties concerned.	Not Applicable	
c.	The contractor must ensure that serviceable ablution facilities are available for employees. It is the responsibility of the holder of the Authorisation to see to it that this condition is adhered to.		
8.2 MANAGEMENT OF ACTIVITY			
8.2.2.1	A copy of the Environmental Authorisation and Environmental Management Programme must be always available on site so as to monitor compliance with conditions outlined in both the documents. Both documents must be used as on-site reference documents during the life of mine.	Compliant	A copy of this EA and the associated BAR are kept at the KBC Environmental Department as well as on the KBC shared networks.
8.2.2.2	The Environmental Management Programme (EMPr) prepared by Ms, Beth Candy of SRK Consulting (Pty) Ltd (attached to the BAR) must be adhered to during the mining period,	Not Applicable	The activities associated with this EA have not yet commenced.
8.2.2.3	All duties and responsibilities as outlined in the Environmental Management Programme attached are binding throughout the life of mine.	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.2.4	Any proposed amendments to the BAR (as a result of this authorisation or otherwise) must be submitted in writing to this Department for approval prior to the amendment being implemented. On approval of the proposed amendment the EMPr must be accordingly amended and adhered to	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.3	Appointment of Environmental Control Officer		
a.	An Environmental Control Officer must be appointed, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the Environmental Authorisation and Environmental Management Programme, prior to any commencement of mining activities on site.	Not Applicable	The activities associated with this EA have not yet commenced.
b.	The ECO must also monitor the implementation of specific elements of the Environmental Management Programme by contractors.	Not Applicable	

c.	All duties and responsibilities as outlined in the Environmental Management Programme attached are binding throughout the life of mine.	Noted	The holder of the authorisation is aware of and understands this condition.
8.2.4	Site Closure and Decommissioning		
8.2.4.1	The commissioning and decommissioning of individual activities within the overall listed mining activity must take place within the phases and timeframes as set out in the EMPr.	Not Applicable	The activities associated with this EA have not yet commenced.
8.2.4.2	The application for closure indicated above must be submitted together with all relevant documents as indicated in Section 43 of Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), as amended.		
8.4.2.3	All mitigation measures for the decommissioning phase, as outlined in the EA. The holder of the EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of the operation.		
8.3 MONITORING			
8.3.1	This Department reserves the right to monitor and audit the activity to ensure compliance with legislation and the conditions stipulated in this authorisation.	Noted	The holder of the authorisation is aware of and understands this condition.
8.3.2	It is the holder of the Authorisation's responsibility to ensure that an ongoing management and monitoring of the impacts of the activity on the environment throughout the life of mine is put into practice.	Noted	The holder of the authorisation is aware of and understands this condition.
8.4 RECORDING AND REPORTING TO THE DEPARTMENT			
8.4.1	Records of monitoring and/or auditing must be made available for inspection to this Department and any other relevant authority inspecting the development activities.	Noted	The holder of the authorisation is aware of and understands this condition.
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.	Not Applicable	The activities associated with this EA have not yet commenced.
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.	Not Applicable	The activities associated with this EA have not yet commenced.
8.5 NON-COMPLIANCE			
	In the event of non-compliance by any contractor during the mining/construction the	Noted	The holder of the authorisation is aware of and understands this condition.

8.5.1	authorised activity, the holder of this Authorisation will be liable.		
8.5.2	The holder shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	Noted	The holder of the authorisation is aware of and understands this condition.
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.	Not Applicable	The activities associated with this EA have not yet commenced.
8.5.4	Records relating to compliance and non-compliance with the conditions of this Authorisation must be kept in good order. Such records shall be made available to this Department within seven (7) days of receipt of a written request by the Department. Environmental compliance will further be monitored through complaints received from the public.	Not Applicable	The activities associated with this EA have not yet commenced.
8.5.5	Non-compliance to this authorisation is an offence as provided for in terms of the National Environmental Management Act, 1998, Section 49(a) and Regulation 48. Any conviction of such offence may result in Section 49(a) being enforced.	Noted	The holder of the authorisation is aware of and understands this condition.
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.		
9.2	The notification referred to in 9.1 must		
9.2.1	Specify the date which the authorisation was issued.	Compliant	<p>Proof of notification of the I&APs on the approval of the EA is retained in the form of:</p> <ul style="list-style-type: none"> • A newspaper advertisement (published 20 July 2018); • Notification letter (dated 20 July 2018); and • Proof of distribution of the notification letter. <p>The newspaper advertisement confirmed that all requirements as per this condition have been addressed.</p>
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.		
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.		
9.2.4	An appeal against the decision must be lodged in terms of Chapter 2 of the National Appeals Regulations of 2014.		

8. DELIBERATIONS

8.1 ADEQUACY AND COMPLIANCE WITH THE KHEWEZELA BOKGONI COLLIERY'S REVISED AND CONSOLIDATED EMPR

8.1.1 Adequacy of the Khwezela Bokgoni Colliery's Aligned EMPr

An assessment was conducted for the determination of the ability of the EMPr to adequately address the impacts that are arising from the Khwezela Bokgoni Colliery operations. No notable issues were raised in terms of the requirements of the EMPr.

Activities undertaken by the mine form part of the approved EMPr and activities not forming part of the EMPr were not observed during the site visit.

8.1.2 Compliance with the Khwezela Bokgoni Colliery's EMPr

The following non-compliances were identified during the audit:

- The EMPr requires that redundant machinery be drained of all oils and fuel before it is stored in the designated areas. If oil/fuel spillages occur, the oil/fuel spillage procedure should be implemented. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin.

It was however found that redundant machinery is not drained of oil and fuel prior to being temporarily stored at the Field Diesel Workshop. Because of this, a number of hydrocarbon spills/leaks were noted during site observations. The leaks were not cleaned-up as per existing procedures.

- The EMPr requires that spill absorbent kits are available in areas where fluid petroleum product spills can occur. It requires that Bokgoni employees adhere to the spillage clean-up procedure. When a spill/leakage occurs, the spill is contained using oil/petroleum absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of in the hazardous waste bin. Remnants of spills which were not picked up by the absorbent material are washed into a silt/oil trap system.

It was however found that the *Khwezela hydrocarbon and chemical handling procedure (AATC026497)* is not conformed to. It was observed that numerous hydrocarbon spills/leaks had occurred in the Field diesel area and these were not cleaned-up as per the existing protocols in place.

- The EMPr requires that ambient air concentrations of bacteria should be measured upwind and downwind of the tanks, however this type of monitoring has not been conducted, upwind and downwind of the Kleinkopje sewage treatment plant. It was determined that this requirement is impractical as the facility is not enclosed. Khwezela has submitted an amendment application to the DMR on 17 February 2021 that includes request to amendment of this specific condition as well. No response from the Department has since been received.
- The EMPr requires that dust on roads be controlled by wetting down the haul roads or applying dusticides to main haul roads, however it was observed that the suppression of dust has not been

undertaken for a long time and certain sections of road have become a fine dust which is easily emitted.

8.2 ADEQUACY AND COMPLIANCE WITH THE KHWEZELA BOKGONI COLLIERY'S PIT 2A EXTENSION OF EIAR AND EMPR

8.2.1 Adequacy of the Khwezela Bokgoni Colliery's Pit 2A Extension of EIAR and EMPr

An assessment was conducted for the determination of the ability of the EMPr to adequately address the impacts that are arising from the Khwezela Bokgoni Colliery Pit 2A section. No notable issues were raised in terms of the requirements of the EMPr – this can be attributed to the fact the most of the actual mining activities granted for Pit 2A are yet to commence.

8.2.2 Compliance with the Khwezela Bokgoni Colliery's EMPr

The following non-compliances were identified during the audit:

8.3 ADEQUACY AND COMPLIANCE WITH THE RECLAMATION OF THE LANDAU 3 MINERAL RESIDUE DEPOSIT: ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

8.3.1 Adequacy of the Khwezela Bokgoni Colliery's Landau 3 EIAR & EMPr

An assessment was conducted for the determination of the ability of the EMPr to adequately address the impacts that are arising from the Khwezela Bokgoni Colliery Landau III Mineral Residue Deposit section. No notable issues were raised in terms of the requirements of the EMPr – this can be attributed to the fact that most of the conditions were found to be in compliance to the conditions and only those required for Closure Phase remain non-applicable at this point in time.

8.3.2 Compliance with the Khwezela Bokgoni Colliery's Landau 3 EIAR & EMPr

No non-compliances were raised during the audit pertaining to compliance with this EMPr.

8.4 ADEQUACY AND COMPLIANCE WITH THE LANDAU 3 BORROW PIT ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

8.4.1 Adequacy of the Khwezela Bokgoni Colliery's Landau 3 Borrow Pit EMPr

An assessment was conducted for the determination of the ability of the EMPr to adequately address the impacts that are arising from the Khwezela Bokgoni Colliery Landau III Borrow Pit section. Since the actual borrow pit activities applied for are yet to commence, no notable issues were raised in terms of the requirements of the EMPr.

8.4.2 Compliance with the Khwezela Bokgoni Colliery's Landau 3 EIAR & EMPr

Since the actual borrow pit activities applied for are yet to commence, no non-compliances were raised during the audit pertaining to compliance with this EMPr.

8.5 COMPLIANCE WITH THE ENVIRONMENTAL AUTHORIZATIONS

8.5.1 Environmental Authorisation for Pit 2A Extension Project

There were no non-compliances raised in terms of compliance to the conditions of the EA.

8.5.2 Environmental Authorisation for Landau III Mine Residue Depot

There were no non-compliances raised in terms of compliance to the conditions of the EA.

8.5.3 Environmental Authorisation for Landau III Mine Residue Deposit Borrow Pit

There were no non-compliances raised in terms of compliance to the conditions of the EA.

9. CONCLUSION

This environmental audit report was compiled to comply with the relevant legislative requirements specifically the NEMA, with the main objectives to report on the compliance status of the commitments and conditions, as well as the appropriateness and adequacy of the various EAs and EMPr. This audit report will be submitted to the competent authority, being the DMRE. Within 7 days of submission of this Audit Report to the competent authority, Khwezela Coal Mining (Pty) Ltd, Bokgoni Colliery, must notify all potential and registered I&APs of the submission, and make this report immediately available to anyone on request and on a publicly accessible website.

It is recommended that Khwezela Colliery address and close-out the non-compliances raised.

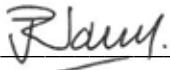
10. DISCLAIMER

This report has been produced by Geovicon Environmental (Pty) Limited, with the skill and care normally exercised by a reasonable Environmental Consultant during the rendering of the service. The service provided by Geovicon Environmental (Pty) Limited should not be considered as legal opinion of any kind but shall be a representation of the findings. The work performed was based on the Client's scope of work, time and resources allocations as well as information provided by the Client. Any reference to legislation in this report should not be considered as a substitute for the provisions of such legislation.

Geovicon Environmental (Pty) Limited ensured by all means that information provided by management and/or representative is correct and relevant thus this report is based on information that could have reasonably been sourced within the time period allocated to the audit performed. It should not be assumed that all possible and applicable findings are included in this report as this report represents a sample of the audit. Therefore, should additional information become available, Geovicon Environmental (Pty) Limited reserves the right to amend its findings accordingly.

11. DECLARATION

I, Ryan Nawn of Geovicon Environmental (Pty) Limited, hereby declare that I am an independent auditor and that Geovicon Environmental (Pty) Limited and myself have no business, financial, personal or other interest in this project in respect of which Geovicon Environmental (Pty) Limited is appointed. Furthermore, no circumstances exist that may compromise the objectivity of Geovicon Environmental (Pty) Limited, excluding fair remuneration for work performed in connection with this external water use licence audit.

Signed: 

Date: 29/11/2021

R. Nawn
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