



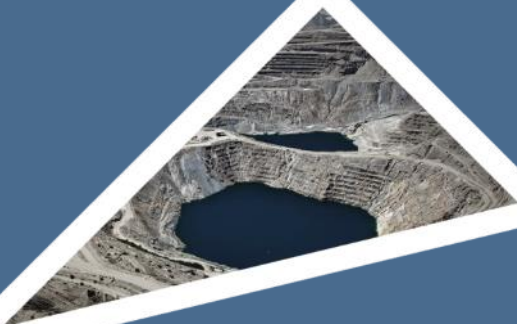
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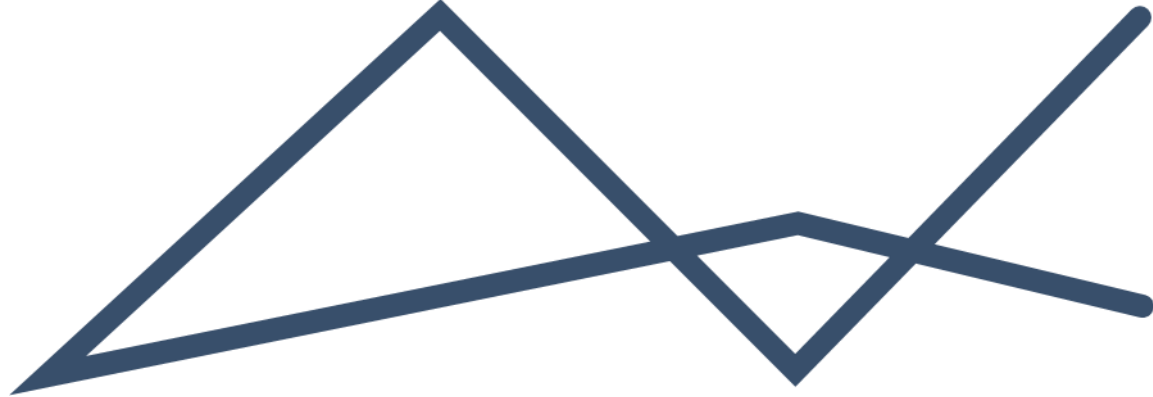
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NEMA ENVIRONMENTAL AUDIT REPORT – MARCH 2023

BMM PROSPECTING RIGHT RENEWAL AUDIT: AROAMS

DMRE Reference Number: NC 30/5/1/1/2/11987 PR





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List of Abbreviations

Abbreviation	Item
EA	Environmental Authorisation
BMM	Black Mountain Mining (Pty) Ltd
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIMS	Environmental Impact Management Services (Pty) Ltd
EMPR	Environmental Management Programme Report
I&AP	Interested and Affected Party
MPRDA	Mineral and Petroleum Resources Development Act, Act 28 of 2002
NEMA	National Environmental Management Act, Act 107 of 1998
PASA	Petroleum Agency of South Africa
PR	Prospecting Right
SAHRA	South African Heritage Resources Agency



EXECUTIVE SUMMARY

Environmental Impact Management Services (Pty) Ltd (EIMS) was appointed by Black Mountain Mining (Pty) Ltd, hereafter referred to as BMM, to undertake the Environmental Audit of the Environmental Authorisation (EA) and Environmental Management Programme (EMPr) for the Aroams Prospecting Right (PR) (DMR reference – NC 30/5/1/1/2/11987 PR). The audit was limited to pre-drilling High Temperature SQUID TEM surveys conducted between October and November 2018 and soil sampling campaign that had been undertaken between August 2019 and February 2020.

The **scope** of the audit is to assess compliance of the pre-drilling High Temperature SQUID TEM surveys and soil sampling activities with the conditions of the approved EA and EMPr and to confirm the continued adequacy of the EMPr in relation to the non-invasive survey activities. The **purpose** of the audit is to ensure compliance with the requirement of the EA and EMPr and the NEMA EIA Regulation 34 to undertake scheduled compliance audits. The **objectives** of the audit are to determine:

- The level of performance against and compliance of the pre-drilling survey and soil sampling with the provisions of the requisite EA and EMPr; and
- The ability of the measures contained in the EMPr, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the pre-drilling activities.

Compliance with the requirements was evaluated using the pre-determined scoring criteria as described in Section 4.2 and the results of the audit are described in Section 5 of this report. A total of 98 conditions (commitments) were identified in the EA that were evaluated. Eighty-six (86) of these conditions were considered not applicable and 12 were considered applicable to the current phase of the project. Of the applicable conditions a total of 10 commitments were noted to be fully compliant, 0 partially complaint and 2 was non-compliant. A total of 96 commitments were identified in the EMPr that were evaluated. Ninety-three (93) of these conditions were considered not applicable and 3 were considered applicable to the current phase of the project. Of the applicable conditions a total of 1 commitment was noted to be fully compliant, 1 partially complaint and 1 was non-compliant.

Based on the evaluation criteria described in Section 4.2, **total compliance scores of 83.3% and weighted compliance of 50% were obtained for the EA and EMPr, respectively. Two (2) non-compliance findings were raised from the compliance evaluation with the conditions of the EA and one (1) non-compliance finding was raised from the EMPr. Based on the audit, the EMPr is considered adequate and effective to manage and mitigate the pre-drilling survey activities and impacts.**



1 INTRODUCTION

A Prospecting Right (PR) was issued to Black Mountain Mining (Pty) Ltd, hereafter referred to as BMM, on 25 April 2018 to prospect for ferrous & base metals (Copper Ore, Iron Ore, Zinc Ore, Lead Ore, Manganese Ore, Nickel and Molybdenum) and all associated metals and minerals, precious metals (Gold Ore, Silver Ore) and all associated metals and minerals. The aim of the project was to ascertain if economically viable mineral deposits exist within the application area.

An application process to undertake prospecting activities in the form of non-invasive surveys and well drilling in the target area identified within Aroams. In terms of the Mineral and Petroleum Resources Development Act (MPRDA, Act No. 28 of 2002) and the National Environmental Management Act (NEMA, Act 107 of 1998) a Basic Assessment (BA) and EMP process was undertaken. The BA and EMP were submitted to the authorities in July 2017 and were approved by the Department of Mineral Resources on 14 October 2017. The Environmental Authorisation (EA) (Ref: NCS 30/5/1/1/3/2/1(11987)).

Environmental Impact Management Services (Pty) Ltd (EIMS) was appointed by BMM to undertake the Environmental Audit of the Environmental Authorisation (EA) and Environmental Management Programme (EMPr) for the Aroams Prospecting Right (DMR Ref: 30/5/1/1/2/11987). The audit was limited to the pre-drilling High Temperature SQUID TEM surveys of the area and soil sampling surveys.

1.1 DETAILS OF THE HOLDER

Details of the holder are summarised in Table 1 below.

Table 1: Details of the holder.

Company Name	Black Mountain Mining (Pty) Ltd
Postal Address	Private Bag x1, Aggeneys, 8893
Physical Address	1 Penge Road, Aggeneys, 8893
Telephone Number	+27 (054) 983 9373
Cell phone Number	
E-mail	Pventer@vedantaresources.co.za
Contact Person	Mr Pieter Venter

1.2 SUMMARY OF ACTIVITIES UNDERTAKEN DURING THE REPORTING PERIOD

As per the BMM Annual Progress Report for period April 2021 to March 2022, the brief summarised events of the prospecting activities were:

- The compilation, review and digitizing of historical geological mapping data from the company's data archives as well as the Council of Geoscience library in Pretoria. Geological mapping was originally envisaged in the Prospecting Work Programmed and would have been conducted in the first 24 months, however, historical geological maps were deemed sufficient.
- A total of two (2) Fixed-loop transient-electromagnetic surveys were conducted over a known zone of interest. The survey made use of a high-power transmitter for maximum depth penetration and sensitive high-temperature SQUID sensors. The survey data was then processed to refine plate models of the targets.
- A regional soil sampling campaign was undertaken between August 2019 and February 2020 the aim to identify anomalous base metals in soils to generate priority targets for follow up prospecting work.



2 DETAILS OF THE AUDITOR

The environmental audit was undertaken by Qaphela Magaqa from EIMS. Qaphela's details are described in section 2.1.

2.1 EXPERTISE OF THE AUDITOR

Qaphela is an Environmental Consultant with 4 years' experience. His expertise lies in environmental management, waste management, GIS, compliance auditing, public participation, and reporting. He has been involved on various projects which included waste management and advisory, GIS, environmental compliance monitoring and environmental authorisation projects. He is a candidate Environmental Assessment Practitioner (2022/6016) and SACNASP registered Certificated Natural Scientist (148967). A detailed CV can be provided on request.

2.2 DECLARATION OF INDEPENDENCE

I, Qaphela Magaqa, declare that –

- I act as the independent Environmental Auditor;*
- I will perform the work relating to the environmental audits in an objective manner, even if this results in views and findings that are not favourable to the Client;*
- I declare that there are no circumstances that may compromise my objectivity in performing such work;*
- I have expertise in conducting environmental audits, including knowledge of the environmental Acts, regulations and any guidelines that have relevance to the audited operations;*
- I will comply with the relevant Acts, regulations, and all other applicable legislation;*
- I have no, and will not engage in, conflicting interests in the audit process;*
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the NEMA; and*
- I do not have and will not have any vested interest (either business, financial, personal, or other) in the audit other than remuneration for work performed.*

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The **scope** of the audit was limited to the compliance of the pre-drilling High Temperature SQUID TEM surveys of the area and soil sampling surveys with the conditions of the approved EA and EMPr and to confirm the continued adequacy of the EMPr in relation to the surveys only. The **purpose** of the audit is to ensure compliance with the requirement of the EA and EMPr and the NEMA EIA Regulation 34 to undertake scheduled compliance audits. The **objectives** of the audit are to determine:

- The level of performance against and compliance of the pre-drilling survey and soil sampling with the provisions of the requisite EA and EMPr; and
- The ability of the measures contained in the EMPr, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the pre-drilling activities.

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

Initial documentation was obtained and reviewed in preparation for the audit. A checklist was prepared based on the requirements of the EA and EMPr. Compliance with the requirements was evaluated using the pre-



determined scoring criteria as described in Section 4.2 and the results of the audit are described in Section 5 of this report.

The Environmental Audit is primarily a Compliance Audit against the conditions of the approved EA and EMPr. Findings from the audit that did not relate to an EMPr condition did not contribute to the audit score. However, where deficiencies have been identified that do not necessarily correspond to EMPr conditions, these findings have been used to provide recommendations for improvement.

Various documentation and records were required during the audit to confirm compliance with the requirements and were made available electronically for review.

There is wide variety of South African environmental legislation, and the organisation is required to comply with all relevant legislation. Whilst consideration was given to the relevant environmental legislation, a full comprehensive legal compliance audit is beyond the scope of this audit. Where reference is made to legislation or other statutory provisions in this report, the original legislation or other statutory provisions will always take precedence and the reader is directed to revert to the original legislation or statutes.

4.2 EVALUATION CRITERIA USED DURING THE AUDIT

The evaluation criteria for compliance scoring were based on a pre-determined scoring system. Each condition of the EA and EMPr was weighted equally to determine a compliance score. The scoring criteria used during the audit are as follows:

- Fully Compliant: Indicating that the condition was fully complied with and provided with a compliance score of 4.
- Partially Compliant: Indicating that the condition has not been fully complied with and that additional measures are required to obtain full compliance. Partial compliances were provided with a compliance score of 2.
- Non-Compliant: Indicating that the condition has not been complied with and provided with a compliance score of 0.
- Not Applicable (N/A): Indicating that the condition is not currently applicable. Not applicable conditions were removed from the total number of conditions from which the compliance score was calculated during this reporting period.

4.3 CONSULTATION PROCESS UNDERTAKEN

The findings of this assessment are based only on interviews and documentation reviewed. No site visit, physical testing or analysis was performed during the assessment and information provided by employees was verified by review only. The Project representatives that were interviewed and assisted with the audit were:

- Bongani Nobela – Acting Senior Geologist Vedex Southern Africa

As per the Regulation 34 of the EIA Regulations, 2014, all potential and registered interested and affected parties should be notified of the submission of the report to the authorities and the report should be made available to anyone on request and it should be made available on a publicly accessible website, where the holder has such a website.

5 RESULTS OF THE AUDIT

The results of the audit have been described in this section of the report. The results include a summary of compliance with the requirements of EA and EMPr, the results of the compliance evaluation, summary of findings as well as a discussion on the continued adequacy of the EMPr within sections 5.1, 5.2 and 5.3 respectively.



5.1 COMPLIANCE SUMMARY

A total of 98 conditions (commitments) were identified in the EA that were evaluated. Eighty-six (86) of these conditions were considered not applicable and twelve (12) were considered applicable to the current phase of the project. Of the applicable conditions eight (10) were noted to be fully compliant, 0 partially compliant and 2 were non-compliant.

A total of 96 commitments were identified in the EMPr that were evaluated. Ninety-six (96) of these conditions were considered not applicable and 3 were considered applicable to the current phase of the project. Of the applicable conditions, one (1) condition was compliant, one (1) condition was partially compliant condition was considered compliant.

The level of compliance for each commitment was calculated according to the methodology described in section 4.2. Utilising this scoring system, **a total compliance score of 83.3% was obtained for the EA and weighted compliance score of 50% for the EMPr.** A summary of the number of conditions of the EA and EMPr rated as Fully Compliant, Partially Compliant and Non-Compliant are presented Figure 1 and Figure 2 respectively.

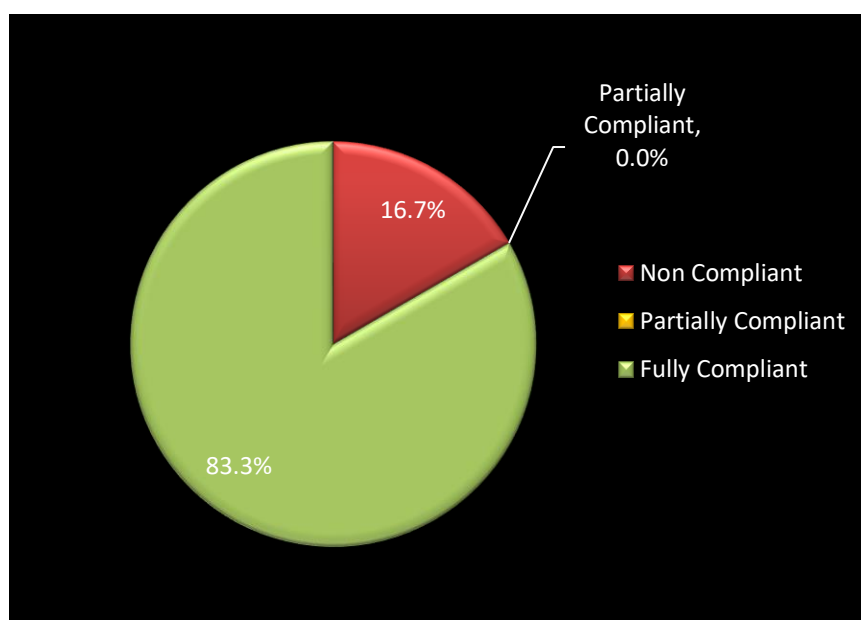


Figure 1: Distribution of compliance ratings for EA conditions.

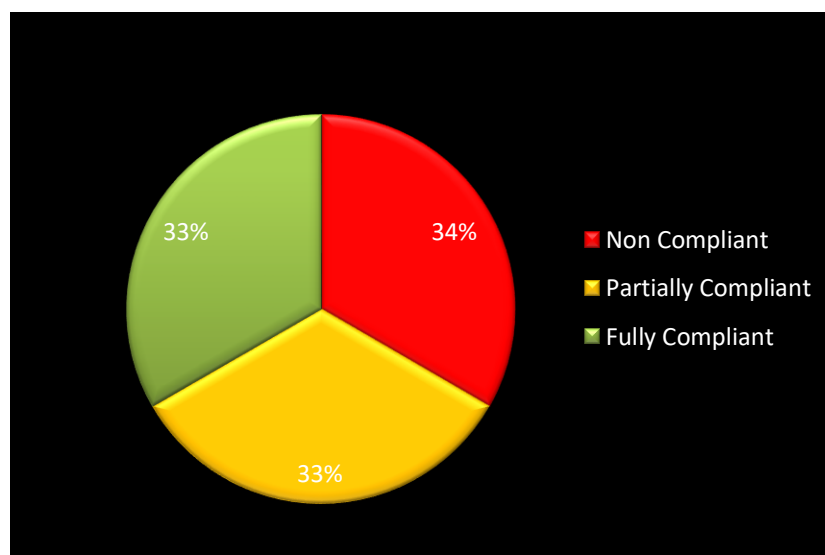


Figure 2: Distribution of compliance ratings for EMPr conditions.



5.2 FINDINGS OF THE AUDIT

Table 2 below shows the summary of audit findings together with recommended corrective actions to address the findings. Three(3) non-compliances were recorded during the reporting period.

Table 2: Audit Findings

NC No.	Ref #	Condition	Finding	Comments/ Verification
001	EA 1.4	Where any of the holder of the EA contact details change including name of the responsible person, physical or postal address/ or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA	Details of EA holder have not been updated.	BMM needs to apply for a Part 1 NEMA amendment to update the details of the EA holder.
002	EA 5.1.1	Submit an Environmental Audit Report to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner and the audit report must specify whether conditions of this environmental authorisation and EMPr/closure plan are adhered to;	Internal annual progress reports with a section stating that there is no significant environmental reporting to be done because there have been no audits were provided during this audit.	An Environmental Assessment Practitioner must be appointed to conduct the biennial environmental audits.
003	EMPr Site Access	The number, identity of workers, work location and work to be done must be provided to the landowner/lawful occupier prior to going on site.	The details of workers, work areas and work to be done were not submitted to the landowner.	An active contract/agreement with the landowner regarding prospecting activities and site access. It is understood that that the Landowner was informed verbally of activities to be carried out.



5.3 CONTINUED ADEQUACY OF THE EMPr

The continued adequacy of the EMPr is discussed in this section of the report.

5.3.1 NEW IMPACTS IDENTIFIED

Based on the review of the pre-drilling High Temperature SQUID TEM surveys of the area and soil sampling surveys requirement of the EMPr, no new impacts were identified.

5.3.2 EFFECTIVENESS OF THE EMPr

Based on the information review, management of the non-invasive activities carried out the EMPr is currently considered adequate and effective to manage and mitigate the applicable activity and impacts.

5.3.3 SHORTCOMINGS IN THE EMPr

Based on the information reviewed during this audit, it is the auditor's interpretation that the pre-drilling mitigation measures of the EMPr did not have any shortcomings.

5.3.4 RECOMMENDATIONS

It is recommended that the organisation should continue to undertake the activities in line with the requirements of the EMPr. Various pre-establishment requirements must be complied with before the establishment of the prospecting drilling infrastructure. These include, inter alia, the notification of relevant stakeholders and the preparation of subsidiary plans.

6 CONCLUSION

EIMS was appointed by BMM to undertake the Environmental Audit to assess compliance with the conditions of the EA and EMPr. Based on the evaluation criteria described in Section 4.2, **a total compliance score of 83.3% was obtained for the EA and , a total compliance score of 50% was obtained for the EMPr. One (3) non-compliance findings were raised from the compliance evaluation. Based on the audit, the EMPr is considered adequate and effective to manage and mitigate the pre-drilling survey activities and impacts.**

The organisation should be reminded of the requirements of Regulations 34 of the EIA Regulations, 2014 with regards to findings of the adequacy of the EMPr and access to the audit report. Regulation 34 states:

- 4) *"Where the findings of the environmental audit report contemplated in sub-regulation (1) indicate-*
- a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or*
 - b) insufficient levels of compliance with the environmental authorisation 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 the shortcomings identified in the environmental audit report.*
- 5) *When submitting recommendations in terms of sub-regulation (4), such recommendations must have been subjected to a public participation process, which process has been agreed to by the competent authority and was appropriate to bring the proposed amendment of the EMPr and, where applicable the closure plan, to the attention of potential and registered interested and affected parties, including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the competent authority, for approval by the competent authority.*
- 6) *Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available-*
- a) to anyone on request; and*
 - b) on a publicly accessible website, where the holder has such a website."*



7 **ASSUMPTIONS, LIMITATIONS AND GAPS IN KNOWLEDGE**

The following assumptions, limitations and gaps in knowledge apply to the audit:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid and true.
- This report is based on information available at the time of the assessment. The information, data, observations and evidence on what this report is based is beyond the control of EIMS and may change without notice. EIMS will not be liable for any loss or damage which may arise directly or indirectly because of such changes.
- Where reference is made to legislation or other statutory provisions in this report the original legislation or other statutory provisions will always take precedence and the reader is directed to revert to the original legislation or statutes.
- The audit was limited to the pre-drilling High Temperature SQUID TEM surveys of the area and soil sampling surveys. The establishment and drilling activities will be audited after the activities were completed in line with the requirements of the EA.



Appendix 1: Compliance Checklist

Table 3: Environmental Authorisation (EA) Compliance Checklist

EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	ANNEXURE 2 - DEPARTMENTAL STANDARD CONDITIONS			
1	SCOPE OF AUTHORISATION			
1.1.	The holder of the EA shall be responsible for ensuring compliance with the conditions contained in the EA. This includes any person acting on the holder's behalf, including but not limited to an agent, servant, contractor, subcontractor, employee, consultant or any person rendering a service to the holder of EA.	N/A	N/A	Statement noted.
1.2.	Any changes to, or deviation from the project description set out in this EA must be approved in writing by this Department before such changes or deviation may be effected. In assessing whether to grant such approval or not, the Department may request such information as is deems necessary to evaluate the significance and impacts of such changes or deviation and it may be necessary for the holder of the EA to apply for further authorisation in terms of the EIA Regulations	N/A	N/A	Statement noted.
1.3.	The activities, which are authorised, may only be carried out at the property (ies) indicated in the EA and or on the approved EMPr.	N/A	N/A	Statement noted.
1.4.	Where any of the holder of the EA contact details change including name of the responsible person, physical or postal address/ or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA	N	0	BMM needs to apply for a NEMA part 1 amendment and update the EA holder details.
1.5.	The EA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the activities.	N/A	N/A	Statement noted.
1.6.	The holder of EA must ensure that all areas where the authorised activities occur have controlled access to ensure safety of people and animals.	N/A	N/A	Statement noted.
2	APPEAL OF AUTHORISATION			
2,1	The holder of IEA must in writing, within 14 (fourteen) calendar days from the date of this decision and in accordance with EIA Regulation 4(2) do the following:	Y	4	Authorisation dated 11 October 2017 was issued 18 October 2017. Decision notifications were sent out via email and fax on the 30 October 2023.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
2.2	Notify all registered I&APs of- 2.2.1 The outcome of the application; 2.2.2 The date of the decision; 2.2.3 The date of issue of the decision and; 2.2.4 The reasons for the decision as included in Annexure 1 and Departmental Standard Conditions on Annexure 2	Y	4	Decision notification letter included all the mentioned requirements.
2.3	Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations,	Y	4	Decision notification letter included all the mentioned requirements.
2.4	Draw the attention of all registered I&APs to the manner in which they may access the decision.	Y	4	Decision notification letter included all the mentioned requirements.
2.5	Provide the registered I&APs with: 2.5.1 Name of the holder (entity) of this EA 2.5.2 Name of the responsible person for this EA 2.5.4 Postal address of the holder; 2.5.5 Telephonic and fax details of the holder and 2.5.5.E-mail address of the holder if any.	Y	4	Decision notification letter included all the mentioned requirements.
3	COMMENCEMENT OF THE ACTIVITY (IES)			
3.1	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	N/A	N/A	No employees on site during the time of this audit.
3.2	This EA must be provided to the site operator and the requirements thereof must be made fully known to him or her.	N/A	N/A	No employees on site during the time of this audit.
3.3	Vegetation clearance must be limited areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion	N/A	N/A	No vegetation clearing has been done on site.
3.4	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	N/A	N/A	Statement noted.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
3.5	An integrated waste management approach must be implemented that is based on waste minimization and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate. Uncontaminated rubble generated on the premises can be re-used as back filling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited on the adjacent properties or public places and open space.	N/A	N/A	Not applicable to this audit as there are no site activities.
3.6	In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the National Water Act, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the holder of the EA reads through and understand the legislative requirements pertaining to the project. It is the Applicant's responsibility to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.	N/A	N/A	Not applicable to this audit as there are no site activities/contractors and employees on site.
3.7	All vehicles must be serviced and maintained in the manner whereby no excessive smokes and noise production is reduced to acceptable levels, and to prevent oil leaks. Contaminated soil must be remediated on site or removed to an authorised landfill site.	N/A	N/A	Not applicable to this audit as there are no site activities.
3.8	Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	N/A	N/A	No noisy activities have been carried out.
3.9	Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust.	N/A	N/A	No activities on site, therefore no dust suppression is required.
3.1	The protection of all historical and pre-historical cultural resources must remain on site and no prospecting activity/-ies is/are allowed within 100 meters from those resources. Should any heritage remains be exposed during operation or any actions on the site, these must immediately be reported to the South African Heritage Resource Agency (SAHRA). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from the South African Heritage Resource Agency (SAHRA). Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; maddens, indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or	N/A	N/A	Not applicable to this audit as there are no site activities.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.			
3.11	Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.	N/A	N/A	Not applicable to this audit as there are no site activities.
3.12	Hydraulic fluid or chemicals must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned immediately by removing spillage together with the polluted solids and dispose it in the authorised disposal site permitted of such waste. The regional office of the Department of Water and Sanitation must be notified within 24 hours of an incident that may pollute surface and underground water resources.	N/A	N/A	Not applicable to this audit as there are no site activities/storage of chemicals and/or fluids on site.
3.13	Chemical sanitation facilities or system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorised waste water treatment works.	N/A	N/A	Not applicable to this audit as there are no site activities/contractors and employees on site.
3.14	The holder of EA must ensure that any water uses listed in terms of Section 21 of National Water Act must get authorization from Department of Water and Sanitation prior to the commencement of such activity (ies).	N/A	N/A	No prospecting will be done in proximity to watercourses and no water uses will be applicable to this project, therefore there is no requirement to apply for Water Use License
3.15	This EA does not purport to absolve the holder of EA from its common law obligations towards the owner of the surface of land affected.	N/A	N/A	Statement noted.
3.16	The holder of EA must ensure that rehabilitation of the disturbed areas caused by operation at all times comply with the approved EMPr.	N/A	N/A	Not applicable to this audit. No rehabilitation is necessary as no intrusive activities have been carried out.
3.17	This EA may be amended or withdrawn at any stage for non-compliance and provides no relief from the provisions of any other relevant statutory or contractual obligations.	N/A	N/A	Statement noted.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
3.18	The holder of EA must note that in terms Section 43A of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), residue deposit and residue deposit must be deposited and managed in a prescribed manner on any site demarcated for that purpose in the Environmental Management Plan or Environmental Management Programme. No person may temporary or permanently deposits residue stockpile or residue deposit on any area or site other than on site indicated on the Environmental Management Plan or Environmental Management Programme.	N/A	N/A	Statement noted.
3.19	The holder of EA must note that in terms Section 20 of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), no person may commence, undertake or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of Section 19 (3) for that activity or a waste management licence is issued in respect of that activity if licence is required.	N/A	N/A	Statement noted.
3.2	An appeal under Section 43 (7)of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended) suspend an EA or exemption or any provisions of conditions attached hereto, or any directive unless the Minister directs otherwise.	N/A	N/A	Statement noted.
3.21	Should you be notified by the Minister of a suspension of the authorisation pending appeal procedure, you may not commence with the activity (ies) until such time that the Minister allows you to commence with such activity (ies) in writing.	N/A	N/A	Statement noted.
3.22	The Department reserves the right to audit and/or inspect the activity (ies) without prior notification at any reasonable time and at such frequency as may be determined by the Regional Manager.	N/A	N/A	Statement noted.
3.23	The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming into contact with the waste and must be diverted away from the storage site.	N/A	N/A	No storage of hydrocarbons on site as there are no activities being carried out.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
3.24	Subject to the commencement and duration requirements of the MPRDA and NEMA for the listed mining activity is valid for the period for which the aforesaid right is granted provided that this activity must commence within 10 years. If the commencement of the proposed activity does not occur within the specified period, the EA lapses and a new application for EA in terms of the NEMA and the EIA Regulations should be made for the activity to be undertaken.	Y	4	BMM has commenced with geophysical surveys, soil sampling campaigns and geological map compilation as part of their Prospecting Works Programme.
3.25	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.	N/A	N/A	Statement noted.
3.26	This EA will only be effective on the event that a corresponding right is issued in terms of MPRDA as amended and none of the activities listed in this EA may commence without right.	N/A	N/A	Statement noted.
3.27	The listed activity (ies), including site preparation, must not commence within 20 (twenty) calendar days of the date of the notification of the decision being sent to the registered I&APs. In the event that an appeal is lodged with the appeal administrator, the effect of this environmental authorisation is suspended until such time as the appeal is decided.	Y	4	No activities were carried out during the appeal period.
3.28	Should there be any conflicting conditions between this EA and other approval granted by other authorities, it is upon the holder of EA to bring it to the attention of the Department for resolution.	N/A	N/A	Statement noted.
4	MANAGEMENT OF ACTIVITY (IES)			
4.1	A copy of the EA and EMPr must be kept at the property or on site office where the activity (lies) will be undertaken. The EA and EMPr must be produced to any authorised officials of the Department who request to see it and must be made available for inspection by any employee or agent of the holder of the EA who works or undertakes work at the property (ies).	N/A	N/A	No site establishment activities or camp has been undertaken.
4.2	The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agent and any other people working on the site, and any updates or amendments to the EMPr must be submitted to the Department for approval.	Y	4	Inductions registers signed by the contractor (MSA) were provided.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
4.3	Regular monitoring and maintenance of storm water drainage facilities must be conducted at all times, if damaged as directed by the Department or any other relevant authority.	N/A	N/A	Not applicable to this audit
4.4	A buffer zone of 100 metres between the activity (ies) and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.	N/A	N/A	No activities have been carried out on site/contractors and/or employees on site.
4.5	The holder of the EA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards.	N/A	N/A	Statement noted.
4.6	The holder of the EA must ensure that all non-recyclable waste are disposed of at waste management facilities licensed to handle such wastes and all recyclable waste are collected by licenced waste management facilities for recycling, reuse or treatment.	N/A	N/A	No activities on site.
4.7	The holder of the EA must ensure that all liquid wastes, whose emissions to water or land could cause pollution are diverted to sewer, after testing water quality and receiving written approval from the relevant local authority.	N/A	N/A	No activities on site/liquid waste.
4.8	Non-compliance with any condition of this IEA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31 L of NEMA.	N/A	N/A	Statement noted.
4.9	This EA only authorises activities specified in the EMPr /closure plan and a new authorisation must be applied for in respect of any new activity not specified as part of the EMPr	N/A	N/A	Statement noted.
4.1	Only listed activities that are expressly specified in the EMPr that forms part of this IEA may be conducted, and additional or new activities not specified herein must be applied for by the holder and authorised by the competent authority in the form of an amendment to the aforesaid EMPr before such activities may be commenced with. This condition is also applicable in the case of the amendment, addition, substitution, correction, removal or updating of any detail in the aforesaid EMPr.	N/A	N/A	Statement noted.
4.11	Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPr.	N/A	N/A	Statement noted. No rehabilitation required at this stage.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
4.12	The Holder of EA must ensure that the name and contact details of the ECO is made available to the Regional Manager within 30 days of commencement. The holder of EA must also ensure that an ECO is always available on site to ensure that activity (ies) at all times comply with the issued EA and approved EMPr.	N/A	N/A	No site establishment has been carried out.
4.13	The ECO must:			
4.13.1	Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material	N/A	N/A	No ECO has been appointed as there have not been any site activities.
4.13.2	Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid reoccurrence of complaints.	N/A	N/A	No ECO has been appointed as there have not been any site activities.
4.13.3	Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials.	N/A	N/A	No ECO has been appointed as there have not been any site activities.
4.13.4	Keep copies of all environmental reports submitted to the Department.	N/A	N/A	No ECO has been appointed as there have not been any site activities.
4.13.5	Keep the records of all permits, licences and authorisations required by the operation.	N/A	N/A	No ECO has been appointed as there have not been any site activities.
4.13.6	Compile a monthly monitoring report and make it available to the Department if requested.	N/A	N/A	No ECO has been appointed as there have not been any site activities.
4.14	The duties and responsibility of the ECO should not be seen as exempting the holder of the EA from the legal obligations in terms of the NEMA	N/A	N/A	Statement noted
4.15	The footprint of the activity (ies) must be limited on the areas authorised for the actual construction works and operational activities and all areas outside of the footprint must be regarded as a "no go" areas.	N/A	N/A	Statement noted.
4.16	Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilizing action such as gabions or re-vegetation must be implemented to prevent further habitat deterioration.	N/A	N/A	No construction activities have been carried out on site.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
4.17	The holder of the EA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risk involved. Records of training and verification of competence must be kept by the holder EA.	N/A	N/A	No waste handling on site currently.
4.18	In order to prevent nuisance conditions, the holder of the EA must ensure that all storage skips and bins are not overfilled	N/A	N/A	No waste facilities on site.
5	Reporting to the Department			
5.1	The holder of EA must:			
5.1.1	submit and Environmental Audit Report to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner and must the audit report must specify whether conditions of this environmental authorisation and EMPr/closure plan are adhered to;	N	0	Internal annual environmental audits were provided during this audit.
5.1.2	identify and assess any new impacts and risks as a result of undertaking the activity/ies, if applicable;	N/A	N/A	Statement noted.
5.1.3	identify shortcomings in the EMPr/closure plan, if applicable;	N/A	N/A	Statement noted.
5.1.4	identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMPr/closure plan;	N/A	N/A	Statement noted.
5.1.5	if applicable, specify that the corrective action/s taken for the previous audit's nonconformities, was adequate;	N/A	N/A	Statement noted.
5.1.6	Specify the name of the auditor and	N/A	N/A	
5.1.7	Be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.	N/A	N/A	
5.2	Should any shortcomings in terms of Regulation 34(4) be identified, the holder must submit recommendation to amend the EMPr/closure plan in order to rectify any shortcomings identified with the aforementioned audit report.	N/A	N/A	Statement noted
5.3	Any complaint received from the I&AP during all phases of the operation must be attended to as soon as possible and addressed to the satisfaction of all concerned interested and affected parties.	N/A	N/A	It was stated that post the Application period, no further complaints/issues were raised.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
5.4	The holder of the EA must annually assess the environmental liabilities of the operation by using the master rates in line with the applicable Consumer Price Index (CPI) at the time and address the shortfall on the financial provision submitted in terms of section 24P of NEMA.	Y	4	Financial provisions were calculated and submitted.
5.5	The holder of the EA must, within 24 hours of incidents occurring, notify the Competent Authority of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.	N/A	N/A	no incidents have occurred on site/no site activities.
5.6	The holder of the EA must, within 14 days, or a shorter period of time, if specified by the Competent Authority from the occurrence or detection of any incident referred to in condition 5.5, submit an action plan, which must include a detailed time schedule, and resource allocation signed off by top management, to the satisfaction of the Competent Authority of measures taken to - 5.6.1 .1 Correct the impact resulting from the incident; 5.6.1 .2 Prevent the incident from causing any further impact; and 5.6.1.3 Prevent a recurrence of a similar incident.	N/A	N/A	Statement noted.
5.7	In the event that measures have not been implemented within 21 days of the incident referred to in condition 5.6, or measures which have been implemented are inadequate, the Competent Authority may implement the necessary measures at the cost of the holder of the IEA.	N/A	N/A	Statement noted.
6	SITE SECURITY AND ACCESS CONTROL			
6.1	The holder of the EA must ensure effective access control on the site to reasonably prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.	N/A	N/A	No site has been established.
6.2	Weather proof, durable and legible notices in at least three official languages applicable in the area must be displayed at each entrance to the Site. These notices must prohibit unauthorised entry and state the hours of operation, the name, address and telephone number of the holder of the IEA and the person responsible for the operation of the site.	N/A	N/A	No site has been established.
7	EMERGENCY PREPAREDNESS PLAN			



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
7.1	The holder of the IEA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and or major accident. The plan must, amongst others, include: 7.1 .1 Site Fire 7.1 .2. Spillage 7.1 .3 Natural disasters such as floods 7.1 .4 Industrial action 7.1 .5 Contact details of police, ambulances and any emergency centre closer to the site.	Y	4	Emergency preparedness plan was submitted as part of documentation required for the audit.
7.2	The holder of EA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.	N/A	N/A	No site has been established. However a emergency preparedness plan is available.
8	INVESTIGATIONS			
8.1	If, in the opinion of the Competent Authority, nuisances or health risks may be or is occurring on the site, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem.	N/A	N/A	Statement noted
8.2	If, in the opinion of the Competent Authority, pollution may be or is occurring, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the water quality variables, at those monitoring points and such frequency as may be specified by the Competent Authority.	N/A	N/A	No site activities/monitoring conducted.
8.3	Investigations carried out in terms of conditions 8.1 and 8.2 above must include the monitoring of the relevant environmental pollution, nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Competent Authority.	N/A	N/A	Statement noted
8.4	Should the investigation carried out as per conditions 8.1 and 8.2 above reveal any unacceptable levels of pollution, the holder of the EA must submit mitigation measures to the satisfaction of the Competent Authority.	N/A	N/A	Statement noted
9	COMMISSIONING AND DECOMMISSIONING			
9.1	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.	N/A	N/A	Statement noted.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
10	SITE CLOSURE			
10.1	The holder of EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of development.	N/A	N/A	No closure activities are planned at this stage.
10.2	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 (Act 28 of 2002), as amended.	N/A	N/A	No closure activities are planned at this stage.
10.3	No exotic plants may be used for rehabilitation purposes only indigenous plant can be utilized for rehabilitation purposes	N/A	N/A	No closure activities are planned at this stage.
10.4	The holder of EA remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of extraneous water, compliance with the conditions of EA and the management and sustainable closure thereof until the Minister has issued a Closure Certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002). Where necessary the Minister may retain certain portion of financial provision for residual, health or environmental impacts that might be known in future.	N/A	N/A	Statement noted
11	ADDITIONAL CONDITIONS			
11.1	A written agreement between Sedibeng and the applicant should be available detailing all the agreed upon water volumes.	N/A	N/A	It was stated that water would be carted from the mine
11.2	The water user is expected to assess all the potential water uses (associated with mining) as defined under section 21 of the National Water Act, 1998 (Act 36 of 1998). All identified water uses will need to be authorized in terms of Section 40 of the National Water Act, unless such a water use is permissible under section 22 of the Act.	N/A	N/A	Statement noted, no listed water uses have been triggered by the planned activities.
12	NEMA PRINCIPLES			
	The NEMA Principles (set out in Section 2 of NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), inter alia, provides for:	N/A	N/A	Statement noted.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	the effects of decisions on all aspects of the environment to be taken into account;	N/A	N/A	Statement noted.
	the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;	N/A	N/A	Statement noted.
	the co-ordination and harmonisation of policies, legislation and actions relating to the environment;	N/A	N/A	Statement noted.
	the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and	N/A	N/A	Statement noted.
	the selection of the best practicable environmental option.	N/A	N/A	Statement noted.
13	DISCLAIMER			
	The Department of Mineral Resources in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.	N/A	N/A	Statement noted.
14	RECOMMENDATIONS			
	In view of the above, the NEMA principles, compliance with the conditions stipulated in this EA, and compliance with the EMPr/closure plan, the competent authority is satisfied that the proposed listed activity/ies will not conflict with the general objectives of Environmental Management stipulated in Chapter 5 of NEMA, and that any potentially detrimental environmental impacts resulting from the listed activity/ies can be mitigated to acceptable levels. The authorisation is accordingly granted.	N/A	N/A	Statement noted.



Table 4: EMPr Compliance Checklist

EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	Site clearance			
	Demarcation of sensitive areas in consultation with relevant specialists and ECO;	N/A	N/A	Site clearance
	Utilise local labour if possible;	N/A	N/A	No labour intensive activities have commenced
	Minimise removal of vegetation as far as possible;	N/A	N/A	Statement noted
	Identification and relocation of protected species by a qualified ecologist (and application of the relevant biodiversity permits where required);	N/A	N/A	Statement noted. No vegetation has been cleared on site.
	Minimize dust generation;	N/A	N/A	Site establishment activities have not yet commenced.
	Limit vehicle access;	N/A	N/A	Site establishment activities have not yet commenced.
	Implement alien vegetation management;	N/A	N/A	Site establishment activities have not yet commenced.
	Ongoing identification of risks and impacts;	N/A	N/A	Site establishment activities have not yet commenced.
	The farm access road running through the Site ARS-06 and Site ARS-07 will be utilized during the proposed prospecting development. It is recommended that temporary heritage signage, indicating the Colonial Period main residence as a 'Caution – Heritage Site', be placed in direct proximity to the site for the duration of drilling activities. Temporary signage should be removed once drilling has been completed.	N/A	N/A	Site establishment activities have not yet commenced.
	Emergency preparedness;	N/A	N/A	Site establishment activities have not yet commenced.
	Monitoring and review; and	N/A	N/A	Site establishment activities have not yet commenced.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	Avoid disturbance of fauna as much as possible, especially bird nesting sites.	N/A	N/A	Site establishment activities have not yet commenced.
Site access				
	All employees and visitors to the site must undergo a site induction which shall include basic environmental awareness and site specific environmental requirements (e.g. site sensitivities and relevant protocols/procedures). This induction should be presented or otherwise facilitated by the Contractors EO/Mine EO wherever possible.	N/A	N/A	Site establishment activities have not yet commenced.
	Landowners/lawful occupiers must be notified prior to accessing properties. A date and time that is suitable to landowners/lawful occupiers and is reasonable to the applicant should be negotiated and agreed upon.	Y	4	An active contract/ agreement with the landowner regarding prospecting activities and site access. It is understood that that the Landowner was informed verbally of activities to be carried out.
	The number, identity of workers, work location and work to be done must be provided to the landowner/lawful occupier prior to going on site.	N/A	N/A	An active contract/agreement with the landowner regarding prospecting activities and site access. It is understood that that the Landowner was informed verbally of activities to be carried out.
	Consideration must be taken by the applicant and/or contractors when on site not to interfere with the existing land uses and practices	N/A	N/A	Statement noted.
Establishment of site infrastructure				
	Minimise physical footprint of construction;	N/A	N/A	No infrastructure has been established on site.
	Ensure construction is consistent with occupational health and safety requirements;	N/A	N/A	No infrastructure has been established on site.
	Minimise vegetation clearance;	N/A	N/A	No infrastructure has been established on site.
	Ensure proper and adequate drainage;	N/A	N/A	No infrastructure has been established on site.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	Minimise waste and control waste disposal	N/A	N/A	No infrastructure has been established on site.
	Fencing of all drill sites with security access control and warning signs;	N/A	N/A	No infrastructure has been established on site.
	Establish waste storage areas for recycling;	N/A	N/A	No infrastructure has been established on site.
	Ensure adequate containment of waste to prevent pollution;	N/A	N/A	No infrastructure has been established on site.
	Minimise dust generation;	N/A	N/A	No infrastructure has been established on site.
	Limit vehicle access to approved access roads;	N/A	N/A	No infrastructure has been established on site.
	Prepare contingency plans for spillage and fire risks.	N/A	N/A	No infrastructure has been established on site.
Storage of construction vehicles				
	Any equipment that may leak, and does not have to be transported regularly, must be placed on watertight drips trays to catch any potential spillages of pollutants. The drip trays must be of a size that the equipment can be placed inside it;	N/A	N/A	No site activities have commenced yet.
	Drip trays must be cleaned regularly and shall not be allowed to overflow. All spilled hazardous substances must be collected and adequately disposed of at a suitably licensed facility; and	N/A	N/A	No site activities have commenced yet.
	Compacting of soil must be avoided as far as possible, and the use of heavy machinery must be restricted in areas outside of the proposed exploration sites to reduce the compaction of soils.	N/A	N/A	No site activities have commenced yet.
Transportation/ access to and from drill sites				
	Where possible, drill sites should be located along existing access roads to reduce the requirement for additional access roads;	N/A	N/A	No site activities have commenced yet.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	Any new temporary access routes to a drill site should result in minimal disturbance to existing vegetation;	N/A	N/A	No site activities have commenced yet.
	Prior to accessing any portion of land, the Applicant must enter into formal written agreements with the affected landowner. This formal agreement should additionally stipulate landowners special conditions which would form a legally binding agreement;	Y	4	A landowner contract/agreement was signed in 2011 and is still active.
	All farm gates must be closed immediately upon entry/exit;	N/A	N/A	Statement noted.
	Under no circumstances may the contractor damage any farm gates, fences, etc.;	N/A	N/A	Statement noted.
	On-site vehicles must be limited to approved access routes and areas on the site so as to minimize excessive environmental disturbance to the soil and vegetation on site, and to minimize disruption of traffic (where relevant);	N/A	N/A	Site has not been established yet.
	All construction and vehicles using public roads must be in a roadworthy condition and their loads secured. They must adhere to the speed limits and all local, provincial and national regulations with regards to road safety and transport;	N/A	N/A	Site has not been established yet.
	Damage caused to public roads as a result of the construction activities must be repaired in consultation with the relevant municipal authorities; and	N/A	N/A	Site has not been established yet.
	All measures should be implemented to minimize the potential of dust generation.	N/A	N/A	Site has not been established yet.
	Storage of hazardous substances			



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	All hazardous substances (e.g. fuel, grease, oil, brake fluid, hydraulic fluid) must be handled, stored and disposed of in a safe and responsible manner so as to prevent pollution of the environment or harm to people or animals. Appropriate measures must be implemented to prevent spillage and appropriate steps must be taken to prevent pollution in the event of a spill; and way that does not pose any danger of pollution even during times of high rainfall.	N/A	N/A	Site has not been established yet.
	Hazardous substances must be confined to specific and secured areas, and stored at all time within bunded areas;	N/A	N/A	Site has not been established yet.
	Adequate spill prevention and clean-up procedures should be developed and implemented during the prospecting activities.	N/A	N/A	Statement noted.
	Should any major spills of hazardous materials take place, such should be reported in terms of the Section 30 of the NEMA.	N/A	N/A	Statement noted.
Waste management				
	Waste generated on site must be recycled as far as possible. Recyclable waste must not be stored on site for excessive periods to reduce risk of environmental contamination;	N/A	N/A	Statement noted.
	Drill muds, formation water (if encountered), etc. would constitute waste and must be classified and ranked in terms of relevant legislation for correct disposal; and	N/A	N/A	Drilling activities have not yet commenced.
	A Waste Management System must be implemented, and provide for adequate waste storage (in the form of enclosed containers) waste separation for recycling, and frequent removal of non-recyclable waste for permanent disposal at an appropriately licensed waste disposal facility. No waste material is to be disposed of on site.	N/A	N/A	Statement noted.
Prospecting boreholes: 5 sites , with a footprint of 200 m² each				



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	Vegetation clearing for prospecting sites should be kept to a minimum in order to reduce the disturbance footprint;	N/A	N/A	No vegetation clearing has been carried out to date.
	Compaction of soil must be avoided as far as possible, and the use of heavy machinery must be restricted in areas outside of the proposed prospecting sites to reduce the compaction of soils;	N/A	N/A	Site has not yet been established, no heavy machinery present.
	All measures should be implemented to minimize the potential of dust generation;	N/A	N/A	Statement noted
	Local residents should be notified of any potentially noisy activities or work and these activities should be undertaken at reasonable times of the day. These works should not take place at night or on weekends;	N/A	N/A	Only SQUID TEM Ground Geophysics Surveys and pXRF Soil Geochemical Surveys have been conducted on site, no noisy activities were carried out.
	Noise attenuation on engines must be adequate, and the noisy activities must be restricted as far as is possible to times and locations whereby the potential for noise nuisance is reduced;	N/A	N/A	Statement noted.
	When working near to a potential sensitive area, the contractor must limit the number of simultaneous activities to the minimum;	N/A	N/A	Statement noted.
	Ensure proper storage of fuels;	N/A	N/A	Statement noted.
	On-site vehicles must be limited to approved access routes and areas on the site so as to minimize excessive environmental disturbance to the soil and vegetation on site, and to minimize disruption of traffic;	N/A	N/A	Site has not been established yet.
	Workforce should be kept within defined boundaries and to agreed access routes.	N/A	N/A	Site has not been established yet.
	No invasive prospecting activities to be undertaken within 100m of a watercourse.	N/A	N/A	Invasive prospecting work has not commenced yet.
	Should any watercourse be affected, then the necessary water use licences should be obtained from the Department of Water and Sanitation.	N/A	N/A	Statement noted.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	No ablution of site laydown areas are to be located within 100m of a watercourse.	N/A	N/A	Statement noted.
	Where shallow aquifers are encountered, a survey of the drinking water/ livestock watering boreholes should be undertaken (within 5km of the prospecting borehole sites). A detailed groundwater monitoring programme should be developed for these drinking water/ livestock watering boreholes and pre- and post-prospecting water quality samples should be taken.	N/A	N/A	Invasive prospecting work has not commenced yet.
	Where drinking water/ livestock watering boreholes are to be affected, and where a pollution event occurs at a particular borehole, then the advice of a geohydrologist should be sought with regards to the need for plugging and casing of the prospecting boreholes.	N/A	N/A	Invasive prospecting work has not commenced yet.
Prospecting				
	Workers must be easily identifiable by clothing and ID badges. Workers should carry with them, at all times a letter from the applicant stating their employment, title, role and manager contact details.	N/A	N/A	Not verifiable by this audit.
Resource definition drilling				
	Local residents (landowners and directly adjacent landowners) should be notified of any potentially noisy activities or work and these activities should be undertaken at reasonable times of the day. This work should not take place at night or on weekends;	N/A	N/A	Only SQUID TEM Ground Geophysics Surveys and pXRF Soil Geochemical Surveys have been conducted on site, no noisy activities were carried out.
	The contractor must attempt to restrict noisy activities as far as is possible to times and locations whereby the potential for noise nuisance is reduced;	N/A	N/A	Drilling activities have not yet commenced.
	Dust suppression methods must be applied when necessary to restrict the visual impact of dust emissions.	N/A	N/A	Site has not been established yet.
	Any spills of hydrocarbons or fluids used during operation, must be cleaned up immediately;	N/A	N/A	Statement noted.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	An above ground drilling sump must be used to contain drilling mud in order to reduce surface and groundwater contamination. No earthen mud sumps are to be constructed and utilized;	N/A	N/A	Drilling activities have not yet commenced.
	No prospecting boreholes should be drilled in the immediate vicinity of existing private boreholes;	N/A	N/A	Drilling activities have not yet commenced.
	Soils in drilling areas where disturbances will be encountered must be stripped and stockpiled outside affected areas for use after completion of the drilling program.	N/A	N/A	Drilling activities have not yet commenced.
	Topsoil must be adequately stripped to the correct depth and stored separately from subsoils;	N/A	N/A	Drilling activities have not yet commenced.
	Cut of trench and berm must be constructed around the drill pad to prevent contaminated surface runoff from entering shallow aquifers and surrounding water resources, where required by the topography;	N/A	N/A	Drilling activities have not yet commenced.
	A liner should be placed over the drill pad and drip trays must be used in all areas where hydrocarbons are handled;	N/A	N/A	Site has not been established yet.
	On-site vehicles must be limited to approved access routes and areas on the site so as to minimize excessive environmental disturbance to the soil and vegetation on site, and to minimize disruption of traffic;	N/A	N/A	Site has not been established yet.
	Workforce should be kept within defined boundaries and agreed access routes;	N/A	N/A	Site has not been established yet.
	The designated competent authority (DMR) may, at the cost of the Applicant, appoint an independent and competent person to undertake borehole examination.	N/A	N/A	Drilling activities have not yet commenced.
	Should any fugitive emissions be detected, then the recommendations of the must be undertaken throughout the drilling activity up to the decommissioning of the wells.	N/A	N/A	Drilling activities have not yet commenced.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	Should any chance finds be uncovered during the construction phase, these must be handled in accordance with the requirements of the National Heritage Resources Act, 1999 (Act 25 of 1999) (NHRA); and	N/A	N/A	Statement noted.
	If a possible heritage site (including graves) or artefact is discovered during construction, all operations in the vicinity of the discovery (at least 30 m buffer) should stop and a qualified specialist contracted to evaluate and recommend appropriate actions. Depending on the type of site that can include initiating a grave relocation process, documentation of structures or archaeological excavations.	N/A	N/A	Statement noted.
Refuelling				
	Refuelling may only take place within demarcated areas that is subject to appropriate spill prevention and containment measures refuelling and transfer of hazardous chemicals and other potentially hazardous substances must be carried out so as to minimize the potential for leakage and to prevent spillage onto the soil;	N/A	N/A	Site has not been established yet.
	Drip trays should be utilized in relevant locations (inlets, outlets, points of leakage, etc.) during transfer so as to prevent such spillage or leakage. Any accidental spillages must be contained and cleaned up promptly.	N/A	N/A	Site has not been established yet.
Maintenance and repair				
	Trucks, machinery and equipment must be regularly serviced to ensure they are in proper working condition and to reduce risk of leaks. All leaks must be cleaned up immediately using spill kits or as per the emergency response plan. For large spills a hazardous materials specialist shall be utilized;	N/A	N/A	No trucks, machinery or equipment at this stage.
	Accidental hydrocarbon spillages must be reported immediately, and the affected soil should be removed, and	N/A	N/A	Statement noted.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	rehabilitated or if this is not possible, disposed of at a suitably licenced waste disposal facility.			
Borehole Closure				
	Where groundwater is encountered during drilling, all affected prospecting boreholes that will not be required for later monitoring or other useful purposes should be plugged and sealed with cement to prevent possible cross flow and contamination between aquifers;	N/A	N/A	No rehabilitation activities on site.
	Cement and liquid concrete are hazardous to the natural environment on account of the very high pH of the material, and the chemicals contained therein. As a result, the contractor shall ensure that: o Concrete shall not be mixed directly on the ground; o The visible remains of concrete, either solid, or from washings, shall be physically removed immediately and disposed of as waste, (Washing of visible signs into the ground is not acceptable); and o All excess aggregate shall also be removed.	N/A	N/A	No rehabilitation activities on site.
Removal of surface infrastructure				
	All infrastructure, equipment, and other items used during prospecting will be removed from the site.	N/A	N/A	No rehabilitation activities on site.
	Compaction of soil must be avoided as far as possible. The use of heavy machinery must be restricted in areas outside of the proposed prospecting sites to reduce the compaction of soils.	N/A	N/A	No rehabilitation activities on site.
Removal of waste				
	Any excess or waste material or chemicals, including drilling muds etc. must be removed from the site and must preferably be recycled (e.g. oil and other hydrocarbon waste products). Any waste materials or chemicals that cannot be recycled must be disposed of at a suitably licensed waste facility.	N/A	N/A	No activities on site.



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
Rehabilitation				
	Restoration and rehabilitation of disturbed areas must be implemented as soon as prospecting activities are completed;	N/A	N/A	No rehabilitation activities applicable.
	Sites must be restored to the original condition with vegetation cover (where applicable) equalling the surrounding vegetation cover;	N/A	N/A	No rehabilitation activities applicable.
	All debris and contaminated soils must be removed and suitably disposed of;	N/A	N/A	No rehabilitation activities applicable.
	Contours and natural surrounding must be reformed;	N/A		No rehabilitation activities applicable.
	Natural drainage patterns must be restored;	N/A	N/A	No rehabilitation activities applicable.
	All surface infrastructure on site must be removed;	N/A	N/A	No rehabilitation activities applicable.
	Temporary access routes/roads must be suitably rehabilitated; and	N/A	N/A	No rehabilitation activities applicable.
	Sites must be monitored by the ECO (including relevant specialist's inputs if, necessary) for adequate rehabilitation until the desired rehabilitation objectives have been achieved	N/A	N/A	No rehabilitation activities applicable.
Consultation				
	Stakeholder engagement will continue throughout the prospecting activities to ensure the community and landowners are kept informed and allowed to raise issues. The Applicant shall attend applicable community meetings with the affected communities. Any issues raised will then be addressed through a grievance mechanism.	N/A	N/A	No site activities have commenced yet.
Monitoring				



EA Reference	Activities / Mitigation Measure	Compliance Y/N	Compliance Rating	Comments/ Verification
	The post-operational monitoring and management period following decommissioning of prospecting activities must be implemented by a suitable qualified independent party for a minimum of one (1) year unless otherwise specified by the competent authority. The monitoring activities during this period will include but not be limited to:• Biodiversity monitoring; and• Re-vegetation of disturbed areas where required. Provision must be made to monitor any unforeseen impact that may arise as a result of the proposed prospecting activities and incorporated into post closure monitoring and management.	N/A	N/A	Not applicable at this stage.