



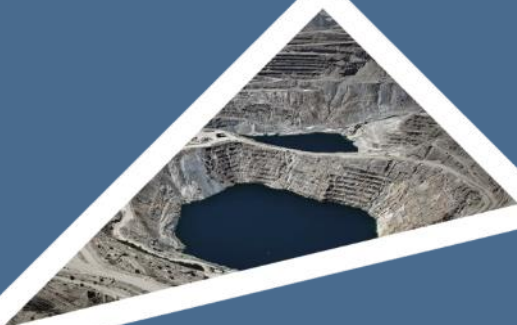
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NEMA ENVIRONMENTAL AUDIT REPORT – MARCH 2023

BMM PROSPECTING RIGHT RENEWAL AUDIT:
DOORNKNIEDOORNKNIE

DMRE Reference Number: 30/5/1/1/3/2/1/11586 PR





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List of Abbreviations

Abbreviation	Item
EA	Environmental Authorisation
BAR	Basic Assessment Report
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
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 Doornknie Prospecting Right(PR) (DMR reference – NC 30/5/1/1/3/2/1/10586 PR). The audit was limited to Versatile Time-Domain Electromagnetic (VTEM™ Plus) system survey conducted in between October and November 2017.

The **scope** of the audit is to assess compliance of the pre-drilling VTEM™ Plus survey 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 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. Ninety (90) of these conditions were considered not applicable and 8 were considered applicable to the current phase of the project. Of the applicable conditions a total of 2 commitments were noted to be fully compliant, 0 partially compliant and 6 were non-compliant. A total of 75 commitments were identified in the EMPr that were evaluated. All Seventy-five (75) of these conditions were considered not applicable to the current phase of the project.

Based on the evaluation criteria described in Section 4.2, a **total compliance scores of 25% obtained for the EA. Six (6) non-compliance findings were raised from the compliance evaluation with the conditions of the EA. 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 Doornknie. 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 EMPr process was undertaken. The BA and EMPr were submitted to the authorities in February 2017 and were approved by the Department of Mineral Resources on 22 August 2017. The Environmental Authorisation (EA) (Ref: NCS 30/5/1/1/3/2/1/11586 PR).

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: 30/5/1/1/2/11586). The audit was limited to the Versatile Time-Domain Electromagnetic (VTEM™ Plus) system survey.

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
Facsimile Number	+27 (011) 7842724
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.
- Based on results of the 2016 Xcalibur airborne magnetic and radiometric survey that provided a complete coverage of the prospecting right, a target area was identified. A helicopter-borne Versatile Time-Domain Electromagnetic (VTEM™ Plus) system was utilised to map conductive stratigraphy in the target area. The survey was conducted between October and November 2017.

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 desktop studies and surveys 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. Ninety (90) of these conditions were considered not applicable and eight (8) were considered applicable to the current phase of the project. Of the applicable conditions, two (2) were noted to be fully compliant, 0 partially compliant and 6 were non-compliant.



A total of 75 commitments were identified in the EMPr that were evaluated. It is noteworthy that since no site establishment or construction activities have commenced, all 75 conditions of the EMPr were not applicable to the current phase of the project.

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 25% was obtained for the EA**. A summary of the number of conditions of the EA rated as Fully Compliant, Partially Compliant and Non-Compliant are presented Figure 1, below .

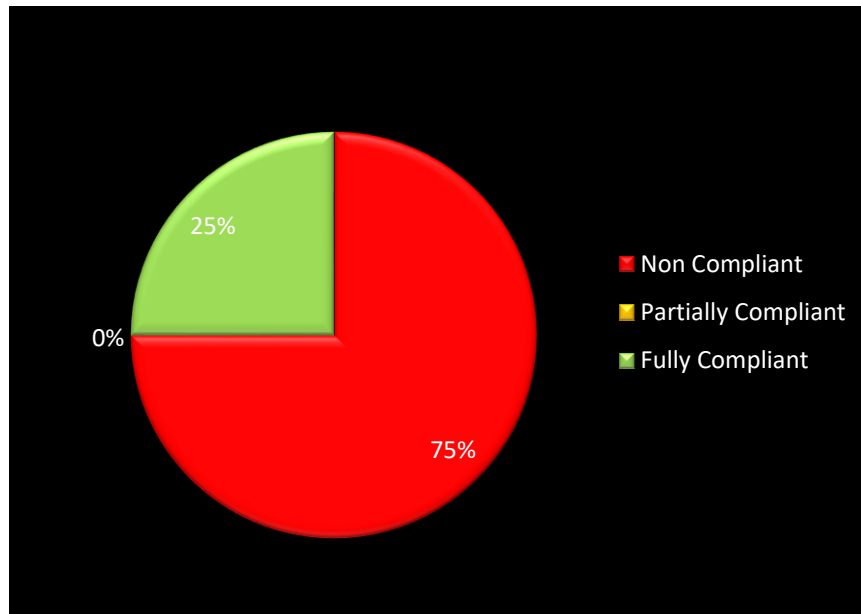


Figure 1: Distribution of compliance ratings for EA conditions.



5.2 FINDINGS OF THE AUDIT

Table 2 below shows the summary of audit findings together with recommended corrective actions to address the findings. Six (6) non-compliance was 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	BMM has not amended the EA or details of the holder/contact person from Mr Dave Payne.	As per the EA condition, BMM needs to apply for a Part 1 EA Amendment to update contact person details on the EA.
002	EA 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: 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	Appeals notification was not conducted as required in the EA.	Proof of I&AP notification
003	EA 3.8	Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	Proof of notification of residents and/was not made available.	Residents need to be informed if any unusually noisy activities are planned.
004	EA 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.	An ECO has to be appointed	It is understood that no ECO has been appointed.



NC No.	Ref #	Condition	Finding	Comments/ Verification
005	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;	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.	Environmental audit reports conducted by a suitably qualified EAP must be submitted.
006	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.	Financial provisions submitted to the department were not updated annually as required.	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.



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 Versatile Time-Domain Electromagnetic (VTEM™ Plus) system survey 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, seeking relevant approvals/letters from 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 25% was obtained for the EA. Conditions of the EMPr were not applicable to the work conducted during the audit period. Six (6) 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 Versatile Time-Domain Electromagnetic (VTEM™ Plus) system survey 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 has not amended the EA or details of the holder/contact person.
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.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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:	N	0	Proofs of I&AP notification were not provided.
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	N/A	N/A	Proofs of I&AP notification were not provided.
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,	N/A	N/A	Proofs of I&AP notification were not provided.
2.4	Draw the attention of all registered I&APs to the manner in which they may access the decision.	N/A	N/A	Proofs of I&AP notification were not provided.
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.	N/A	N/A	Proofs of I&AP notification were not provided.
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	It is understood that no site works were conducted, only airborne surveys and desktops have been conducted. Therefore no site specific PPE has been required.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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 active site activities 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	Vegetation clearing activities have not commenced 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.
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	Site establishment activities have not commenced.
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	Statement noted.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
3.7	All vehicle 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	No active site activities during the time of this audit.
3.8	Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	N	0	Proof of notification of residents and/was not made available. It is understood that there are no residents living in close proximity to survey area
3.9	Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust.	N/A	N/A	No active site activities during the time of this audit.
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 diameters 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 artcrafts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or 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.	N/A	N/A	No active site activities/groundworks during the time of this audit.
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	No active site activities/groundworks during the time of this audit.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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	Site establishment activities have not commenced.
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	Site establishment activities have not commenced.
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	It is understood that no activities are to be established within a regulated area and water to be used for prospecting activities is to be sourced from the existing BMM mine. A written confirmation from DWS allowing water allocated for the mining to be utilised for prospecting.
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	No rehabilitation activities possible at this atage.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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.
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.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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 hydrocarbon storage/site activities during time of this audit.
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 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.	N/A	N/A	Proof of appeal notification was not made available during this audit.
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)			



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
4.1	A copy of the EA and EMPr must be kept at the property or on site office where the activity (ies) 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 activities have been carried out on site/contractors and/or employees on site.
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.	N/A	N/A	Statement noted.
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	Site establishment activities have not yet commenced.
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	Site establishment activities have not yet commenced.
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	Statement noted.
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.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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.
4.10	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	No rehabilitation activities possible at this atage.
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	0	It is understood that no ECO has been appointed.
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 was appointed by BMM.
4,13,2	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 was appointed by BMM.
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 was appointed by BMM.
4,13,4	Keep copies of all environmental reports submitted to the Department.	N/A	N/A	No ECO was appointed by BMM.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
4,13,5	Keep the records of all permits, licences and authorisations required by the operation.	N/A	N/A	No ECO was appointed by BMM.
4,13,6	Compile a monthly monitoring report and make it available to the Department if requested.	N/A	N/A	No ECO was appointed by BMM.
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. Site establishment and construction activities have not yet commenced.
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	Statement noted. Site establishment and construction activities have not yet commenced.
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	Statement noted. Site establishment and/site infrastructure placement activities have not yet commenced.
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	Statement noted. Site establishment and/site infrastructure placement activities have not yet commenced.
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 EMP/closure plan are adhered to;	N	0	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.
5,1,3	identify shortcomings in the EMPr/closure plan, if applicable;	N/A	N/A	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.
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	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.
5,1,5	if applicable, specify that the corrective action/s taken for the previous audit's nonconformities, was adequate;	N/A	N/A	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.
5,1,6	Specify the name of the auditor and	N/A	N/A	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.
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	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.
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 is understood that post the application process, no further complaints and/or issues were raised.
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.	N	0	No Environmental reporting has been submitted to the department. Only internal annual reports were made available.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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	Statement noted.
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 access required
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 access required
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	An emergency preparedness plan was made available during this 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	Statement noted.
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	Statement noted.
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			



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
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 is noted.
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	Statement is noted.
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	Statement is noted.
10.3	No exotic plants may be used for rehabilitation purposes only indigenous plant can be utilized for rehabilitation purposes	N/A	N/A	Statement is noted.
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 is 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	During the date of this audit no water allocation to prospecting is required. It was noted that the water for prospecting works would be sourced from the BMM mine with an existing water use license. It is recommended



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
				that DWS is notified and written approval to allocate water to prospecting activities be sought
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	During the date of this audit no water allocation to prospecting is required. It was noted that the water for prospecting works would be sourced from the BMM mine with an existing water use license. It is recommended that DWS is notified and written approval to allocate water to prospecting activities be sought
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 is noted.
	the effects of decisions on all aspects of the environment to be taken into account;	N/A	N/A	Statement is 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 is noted.
	the co-ordination and harmonisation of policies, legislation and actions relating to the environment;	N/A	N/A	Statement is noted.
	the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and	N/A	N/A	Statement is noted.



EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	the selection of the best practicable environmental option.	N/A	N/A	Statement is 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 is 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 is noted.



Table 4: EMPr Compliance Checklist

EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Invasive Prospecting Activities - Site access/roads				
Destruction and/or disturbance of on-site fauna, flora and sensitive areas	Control through the clear delineation of the prospecting area.	N/A	N/A	Invasive activities have not commenced yet.
Potential destruction of heritage resources	Control through the clear delineation of the prospecting area.	N/A	N/A	Invasive activities have not commenced yet.
Poor access control resulting in un-authorised people entering the site	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	Site establishment activities have not yet commenced
Activities within the watercourse could result in disturbance to the natural geomorphology and safety hazards during rainy periods	Control through the clear delineation of the prospecting area	N/A	N/A	Invasive activities have not commenced yet.
Useable infrastructure for future use	Mitigation through rehabilitation	N/A	N/A	No rehabilitation activities at this stage.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Rehabilitation of access roads	Mitigation through rehabilitation	N/A	N/A	No rehabilitation activities at this stage.
Destruction and/or disturbance of dry river beds, pans and sensitive areas	Avoidance according to regulatory specification. Control through the clear delineation of the sensitive areas.	N/A	N/A	Site establishment activities have not yet commenced
Soil compaction resulting from repeated use of access roads to sites	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
Vehicle traffic noise impact affecting cattle and/or wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	
Drill sites				
Destruction and/or disturbance of dry riverbed, pans and/or sensitive areas	Avoidance according to regulatory specification.	N/A	N/A	Invasive activities have not commenced yet.
	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Dust emission resulting from site clearing, soil stripping and construction activities (including dust generated by vehicle movement)	Control to the implementation of dust suppression methods, when this is required. Dust suppression methods could include wet suppression.	N/A	N/A	No invasive activities have commenced.
Noise as a result of construction, operation and vehicle movement resulting in disturbance of fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.			
Soil contamination resulting from waste generation, disposal of drill fluids or storage of hazardous materials	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced/rehabilitation activities.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
Soil disturbance and compaction and topsoil stockpiling resulting in soil erosion	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
Visual impact affecting visual character	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.			No invasive activities have commenced.
Influx of persons (job seekers) to site as a result of increased activity resulting in increased incidents of theft and opportunistic crime	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication			
Potential destruction of heritage resources	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
Rehabilitation of drill sites	Mitigation through rehabilitation	N/A	N/A	No invasive activities have commenced.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Excavation of sumps				
Destruction or disturbance of onsite fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
Water and soil pollution resulting from disposal of drill fluids	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	No invasive activities have commenced.
Rehabilitation of sumps	Mitigation through rehabilitation	N/A	N/A	No invasive activities have commenced.
Exploration drilling				
Destruction and/or disturbance of on-site fauna	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
Dust emission from drilling and general site activities (including	Control to the implementation of dust suppression methods, when this is required. Dust suppression methods could include wet suppression.	N/A	N/A	No invasive activities have commenced.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
dust generated by vehicle movement)				
Noise impact as a result of exploration drilling, causing disturbance of fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	No invasive activities have commenced.
Water and soil pollution resulting from disposal of drill fluids, hydrocarbon spills, storage of hazardous materials and waste generation	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP	N/A	N/A	No invasive activities have commenced.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
Impact on water courses and associated ecosystems in the area	Control through the implementation of the NWA GN704 water management principles.			No invasive activities have commenced.
Impact on water courses and associated ecosystems in the area	delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	No invasive activities have commenced.
Useable infrastructure for future use	Mitigation through rehabilitation	N/A	N/A	No invasive activities have commenced.
Rehabilitation of boreholes	Rehabilitation of boreholes	N/A	N/A	No invasive activities have commenced.
Camp Sites				
Destruction and/or disturbance of on-site fauna, flora, rivers, pans	Avoidance according to regulatory specification.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification				
and sensitive areas	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment	activities	have	not	yet
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment	activities	have	not	yet
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	Site establishment	activities	have	not	yet
Destruction or disturbance of onsite fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment	activities	have	not	yet
Dust emission resulting from site clearing, soil stripping and construction activities (including dust generated by vehicle movement)	Control to the implementation of dust suppression methods, when this is required. Dust suppression methods could include wet suppression.	N/A	N/A	Site establishment	activities	have	not	yet
Noise as a result of construction, operation and vehicle movement resulting in disturbance of fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment	activities	have	not	yet
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	Site establishment	activities	have	not	yet
Potential water and soil pollution	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment	activities	have	not	yet



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
resulting from waste generation	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced
Soil disturbance and compaction and topsoil stockpiling resulting in soil erosion	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	Site establishment activities have not yet commenced
Visual impact affecting visual character	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks	N/A	N/A	Site establishment activities have not yet commenced
Potential destruction of heritage resources	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
Losses as a result of fire	Control through the implementation of emergency preparedness response plan.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
Rehabilitation of camp sites	Mitigation through rehabilitation	N/A	N/A	Site establishment activities have not yet commenced
Ablution facilities				
Potential water and soil pollution	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
resulting from waste spills resulting from improper maintenance	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
Waste management				
Potential water and soil pollution resulting from improper waste storage and management	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
Water management				
Spillages of water due to negligence or	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
unmaintained equipment	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
Re-Fuelling and maintenance				
Potential water and soil pollution resulting from hydrocarbon spills and hazardous waste storage	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
EA Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Invasive Prospecting Activities - Site access/roads				
Destruction and/or disturbance of on-site fauna, flora and sensitive areas	Control through the clear delineation of the prospecting area.	N/A	N/A	Invasive activities have not commenced yet.
Potential destruction of heritage resources	Control through the clear delineation of the prospecting area.	N/A	N/A	Invasive activities have not commenced yet.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Poor access control resulting in un-authorised people entering the site	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	Site establishment activities have not yet commenced
Activities within the watercourse could result in disturbance to the natural geomorphology and safety hazards during rainy periods	Control through the clear delineation of the prospecting area	N/A	N/A	Invasive activities have not commenced yet.
Useable infrastructure for future use	Mitigation through rehabilitation	N/A	N/A	No rehabilitation activities at this stage.
Rehabilitation of access roads	Mitigation through rehabilitation	N/A	N/A	No rehabilitation activities at this stage.
Destruction and/or disturbance of dry river beds, pans and sensitive areas	Avoidance according to regulatory specification. Control through the clear delineation of the sensitive areas.	N/A	N/A	Site establishment activities have not yet commenced
Soil compaction resulting from repeated use of access roads to sites	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
Vehicle traffic noise impact affecting cattle and/or wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	
Drill sites				
Destruction and/or disturbance of dry riverbed, pans and/or sensitive areas	Avoidance according to regulatory specification.	N/A	N/A	Invasive activities have not commenced yet.
	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
Dust emission resulting from site clearing, soil stripping and construction activities (including dust generated by vehicle movement)	Control to the implementation of dust suppression methods, when this is required. Dust suppression methods could include wet suppression.	N/A	N/A	No invasive activities have commenced.
Noise as a result of construction, operation and vehicle movement resulting in disturbance of fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.			



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Soil contamination resulting from waste generation, disposal of drill fluids or storage of hazardous materials	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced/rehabilitation activities.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
Soil disturbance and compaction and topsoil stockpiling resulting in soil erosion	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
Visual impact affecting visual character	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.			No invasive activities have commenced.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Influx of persons (job seekers) to site as a result of increased activity resulting in increased incidents of theft and opportunistic crime	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication			
Potential destruction of heritage resources	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
Rehabilitation of drill sites	Mitigation through rehabilitation	N/A	N/A	No invasive activities have commenced.
Excavation of sumps				
Destruction or disturbance of onsite fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
Water and soil pollution resulting from disposal of drill fluids	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	No invasive activities have commenced.
Rehabilitation of sumps	Mitigation through rehabilitation	N/A	N/A	No invasive activities have commenced.
Exploration drilling				



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Destruction and/or disturbance of on-site fauna	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
Dust emission from drilling and general site activities (including dust generated by vehicle movement)	Control to the implementation of dust suppression methods, when this is required. Dust suppression methods could include wet suppression.	N/A	N/A	No invasive activities have commenced.
Noise impact as a result of exploration drilling, causing disturbance of fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	No invasive activities have commenced.
Water and soil pollution resulting from disposal of drill fluids, hydrocarbon spills, storage of hazardous materials and waste generation	Control through the clear delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP	N/A	N/A	No invasive activities have commenced.



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
Impact on water courses and associated ecosystems in the area	Control through the implementation of the NWA GN704 water management principles.			No invasive activities have commenced.
Impact on water courses and associated ecosystems in the area	delineation of the prospecting area.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	No invasive activities have commenced.
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	No invasive activities have commenced.
Useable infrastructure for future use	Mitigation through rehabilitation	N/A	N/A	No invasive activities have commenced.
Rehabilitation of boreholes	Rehabilitation of boreholes	N/A	N/A	No invasive activities have commenced.
Camp Sites				
Destruction and/or disturbance of on-site fauna, flora, rivers, pans and sensitive areas	Avoidance according to regulatory specification.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the limiting of the activities to the day time and the implementation of an	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	open and transparent channel of communication.			
Destruction or disturbance of onsite fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
Dust emission resulting from site clearing, soil stripping and construction activities (including dust generated by vehicle movement)	Control to the implementation of dust suppression methods, when this is required. Dust suppression methods could include wet suppression.	N/A	N/A	Site establishment activities have not yet commenced
Noise as a result of construction, operation and vehicle movement resulting in disturbance of fauna / livestock / wildlife	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the limiting of the activities to the day time and the implementation of an open and transparent channel of communication.	N/A	N/A	Site establishment activities have not yet commenced
Potential water and soil pollution resulting from waste generation	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Soil disturbance and compaction and topsoil stockpiling resulting in soil erosion	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	Site establishment activities have not yet commenced
Visual impact affecting visual character	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks	N/A	N/A	Site establishment activities have not yet commenced
Potential destruction of heritage resources	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
Losses as a result of fire	Control through the implementation of emergency preparedness response plan.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
Rehabilitation of camp sites	Mitigation through rehabilitation	N/A	N/A	Site establishment activities have not yet commenced
Ablution facilities				
Potential water and soil pollution resulting from waste spills resulting from improper maintenance	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
Waste management				



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Potential water and soil pollution resulting from improper waste storage and management	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
Water management				
Spillages of water due to negligence or unmaintained equipment	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.
Re-Fuelling and maintenance				
Potential water and soil pollution resulting from hydrocarbon spills and hazardous waste storage	Control through the clear delineation of the prospecting area.	N/A	N/A	Site establishment activities have not yet commenced
	Control through the implementation of a soil management programme in terms of the correct topsoil removal, stockpiling and rehabilitation practices as discussed in the EMP.	N/A	N/A	No invasive activities have commenced.
	Control through the implementation of environmental induction and toolbox talks.	N/A	N/A	Site establishment activities have not yet commenced



EMPR Reference	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	Control through the implementation of the NWA GN704 water management principles.	N/A	N/A	Site establishment activities have not yet commenced. It is recommended that DWS is notified of the commencement of the Activity 14 days prior to site establishment as per the NWA GN 704 principles.