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Biennial External Environmental Audit Report for the Cons Modder (Gedex) Mine, Brakpan, Gauteng

Prepared for

Newshelf 1186 (Pty) Ltd

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Acronyms

7#	Cons Modder 7 Shaft
10#	Cons Modder 10 Shaft
AIP	Alien Invasive Plant
AIPCP	Alien Invasive Plant Control Plan
APM	Archaeological and Palaeontological Management
AQM	Air Quality Management
AQMS	Air Quality Monitoring Station
ASPT	Average Score Per Taxon
BDM	Biodiversity Management
BMC	Blast Management and Consulting (Pty) Ltd
BSM	Blasting and Subsidence Management
C	Compliant
CBA	Critical Biodiversity Area
CA	Competent Authority
CM	Cons Modder
COD	Chemical Oxygen Demand
CoE	City of Ekurhuleni
DFFE	Department of Forestry, Fisheries and the Environment
DMPR	Department of Mineral and Petroleum Resources
DO	Dissolved Oxygen
DS	Downstream
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
EAR	Environmental Audit Report
EC	Electrical Conductivity
ECO	Environmental Control Officer
ECSA	Engineering Council of South Africa
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMPr	Environmental Management Programme
ERP	Emergency Response Plan
EWR	Environmental Water Requirement
FP	Financial Provision
GM	General Manager
GN	Government Notice
GNR	Government Notice Regulation
GP	Gauteng Province
GWM	Groundwater Monitoring Management
HCM	Hydrocarbon Management
HR	Human Resources
HSHWM	Hazardous Substances / Hazardous Waste Management

IAIAsa	International Association for Impact Assessment (South Africa)
IAP	Interested and Affected Party
IBC	Intermediate Bulk Container
IBR	Inverted Box Rib
IEA	Integrated Environmental Authorisation
IHAS	Invertebrate Habitat Assessment System
IWWMP	Integrated Waste and Water Management Plans
LoM	Life of Mine
MEO	Modder East Operations
MIRAI	Macro-invertebrate Response Assessment Index
MPRDA	Mineral and Petroleum Resources Development Act
MR	Mining Right
MSDS	Material Safety Data Sheet
MU	Monitoring Unit
MWP	Mining Work Programme
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NAEIS	National Atmospheric Emissions Inventory System
NC	Non-Compliant
NDCR	National Dust Control Regulations
NEM:AQA	National Environmental Management: Air Quality Act
NEM:BA	National Environmental Management: Biodiversity Act
NEMA	National Environmental Management Act
NKGM	New Kleinfontein Gold Mine
NL	Non-listed
NM	Noise Monitoring Management
NUMSA	National Union of Metalworkers of South Africa
NWA	National Water Act
P&Gs	Preliminary and General
PC	Partially Compliant
PM	Particulate Matter
PPE	Personal Protective Equipment
PPV	Peak Particle Velocity
RE	Remaining Extent
RO	Reverse Osmosis
RQO	Resource Quality Objectives
RWQO	Resource Water Quality Objective
SACNASP	South African Council for Natural Scientific Professions
SAIMM	Southern African Institute of Mining and Metallurgy
SANS	South African National Standards
SAS	Scientific Aquatic Services
SASS	South African Scoring System
SCC	Species Of Conservation Concern
SE	South-east
SEM	Socio-economic Management

SLP	Social and Labour Plan
SM	Soil Management
SMCC	State Mines Country Club
SS	Suspended Solids
SVP	Senior Vice President
SW	South-west
TCTA	Trans-Caledon Tunnel Authority
TDS	Total dissolved solids
TM	Traffic Management
TON	Total oxidised nitrogen
US	Upstream
VAT	Value Added Tax
VM	Visual Management
WAM	Water Management
WML	Waste Management Licence
WRD	Waste rock dump
WUL	Water Use Licence
WWTW	Wastewater Treatment Plant

Units and Symbols

Al	Aluminium
As	Arsenic
Ca	Calcium
Cl	Chloride
CN	Cyanide
Co	Cobalt
Cr	Chromium
Cu	Copper
dB(L)	decibel (linear peak sound pressure level)
dB(A)	A-weighted decibel
F	Fluoride
ha	Hectares
Hg	Mercury
K	Potassium
km	Kilometre
km/h	kilometres per hour
l	litres
m	metre
mbc	metres below collar
Mg	Magnesium
mg/l	milligram per litre
mg/m^2/day	milligrams per square metre per day
mm/s	millimetres per second
Mn	Manganese
NH_3	Ammonia
NH_4	Ammonium
Ni	Nickel
NO_3	Nitrate
PO_4	Phosphate
Se	Selenium
Si	Silicon
SO_4	Sulphate
T.Alk	Total alkalinity
µg/m^3	micrograms per cubic metre
Zn	Zinc
<	Less than
≤	Less than or equal to
>	Greater than
≥	Greater than or equal to

1 INTRODUCTION AND GENERAL INFORMATION

This report presents the findings of an independent Environmental Authorisation (EA) compliance audit undertaken for the Cons Modder Mine, operated by Newshelf 1186 (Pty) Ltd ("Newshelf"), in the Gauteng Province. The audit was conducted in accordance with the requirements of the National Environmental Management Act, No. 107 of 1998 (NEMA), and the conditions of the approved EA and associated Environmental Management Programme (EMPr).

1.1 Licence holder

Table 1. Details of the licence holder

Licensee	Newshelf 1186 (Pty) Ltd
Site	Cons Modder (Gedex) Mine
Sector	Mining
Commodity	Gold
Project phase	Construction and operational
Physical address (site)	Remaining extent (RE) of Portion 3 of the Farm Modderfontein 76 IR - 7# accessed via Hewit Street, Brakpan, 1541 - 10# accessed via Pfuhl Street, Brakpan, 1541
Physical address (head office)	Constantia Office Park, Building 17, Cycad House, Ground Floor, Corner 14th Avenue and Hendrik Potgieter Road, Weltevreden Park, Roodepoort, Johannesburg, 1709
Postal address	Postnet Suite 002, Private Bag X5, Strubens Valley, 1735
Responsible person	Jon Hericourt (GM – Modder East Operation and SVP Operations)
Email address	Jon.Hericourt@gold1.co.za
Site contact/s	Busisiwe Mthembu (Environmental Manager)
Email address	busisiwe.mthembu@gold1.co.za
Competent authority	Department of Mineral and Petroleum Resources
Licence type	Environmental Authorisation
Licence reference number	GP 30/5/1/2/3/2/1(10061) EM
Date of issuance	7 August 2020
Authorised listed activities	- Listing notice 1, GNR 983 – Activities 12, 14, 19, 24 and 17 - Listing notice 2, GNR 984 – Activities 6, 17, and 19 - Listing notice 3, GNR 985 – Activities 4, 10, 12, 14, and 15

1.2 Independent external auditor

Table 2. Details of the independent external auditor

Company	Prime Resources (Pty) Ltd
Physical address	The Workshop, 70 7th Avenue, Parktown North, 2193, Johannesburg
Postal address	Postnet Suite No. 002, Private Bag X1, Woodhill 0076
Telephone number	011 447 4888
Email address	prime@resources.co.za
Contact person	Louise Jones
Professional affiliations	PrEng | SACNASP | ECSA | SAIMM | EAPASA | IAIAsa
Authors	Monique van der Westhuizen
Reviewers	Gené Main

Prime Resources (Pty) Ltd ("Prime Resources") is a specialist environmental consulting firm providing environmental and related services and was established in 2003. Prime Resources was founded by Peter Theron (PrEng 950329, SAIMM), who has over 35 years' experience in the field of environmental science and engineering.

Gené Main (Pr. Sci. Nat. Environmental Science, SACNASP registered in 2013; Environmental Assessment Practitioner (EAP), registered with EAPASA in 2020, reg. no. 2019/1257), the Project Manager and Principal Scientist for the project, has a M.Sc. (Botany) from the University of the Western Cape and over 18 years of experience in the field of environmental consulting.

Louise Jones (EAPASA registered 2019/1367) is a Principal Scientist with over 10 years of experience in the field of environmental science. Her expertise includes environmental impact assessments and management planning, financial liability assessments associated with mine closure and rehabilitation as well as environmental compliance auditing.

Monique van der Westhuizen is an Environmental Scientist with a BSc Honours in Hydrogeology. She has five years of experience in groundwater systems, environmental monitoring, laboratory work, environmental reporting and auditing, ECO work, and various Environmental Authorisation processes.

1.3 Appointment and mandate

Prime Resources was appointed by Newshelf to conduct a biennial external environmental compliance audit of its EA (licence ref. no.: GP30/5/1/2/3/2/1(10061) EM) for operations at Newshelf's Cons Modder Mine. The previous audit was undertaken in November 2023, covering the period December 2021 to November 2023.

The audit is undertaken in fulfilment of the requirements of Regulation 34 of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), and the following conditions of the EA issued on 7 August 2020:

Condition 4 (site-specific conditions) –

> *"An EAR, compiled by an independent specialist must be submitted to this Department on a biennial basis as required in terms of section 24Q of the NEMA."*

Condition 5.1 (reporting to the Department) –

> *"The holder of the EA must submit an EAR to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner and audit report must specify whether conditions of this environmental authorisation and EMPr / closure plan are complied with, to:*
>
> *5.1.1. identify and assess any new impacts and risks as a result of undertaking the activity/ies, if applicable*
>
> *5.1.2. identify shortcomings in the EMPr/closure plan, if applicable*
>
> *5.1.3. identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMPr/closure plan*
>
> *5.1.4. if applicable, specify that the corrective action/s taken for the previous audit's non-conformities was adequate*
>
> *5.1.5. Specify the name of the auditor*

5.1.6. The audit report must be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.

This Environmental Audit Report (EAR) covers the period from November 2023 to February 2026 and will be submitted to the Competent Authority (CA), i.e., the Department of Mineral and Petroleum Resources (DMPR).

1.4 Declaration of independence

As the appointed external auditor, Prime Resources has no other beneficial interest in Newshelf's Cons Modder Mine as pertains to the undertaking of this assignment other than fair remuneration in accordance with normal professional environmental consulting practice. The conclusions and opinions expressed in this report are entirely those of Prime Resources and are based wholly upon the information described throughout this report.

The environmental consultants, scientists and engineers under the employ of Prime Resources, insofar as the undertaking of this assignment:

Do not have any financial interest in the undertaking of the activity, other than fair remuneration for the work performed.

- Have not, and will not, engage in conflicting interests in the undertaking of the activity.
- Undertake to disclose to the CA, any material information that has or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document.
- Will provide the Competent Authority with access to all information at our disposal, whether such information is favourable to the licence holder or not.
- Based on the information provided to Prime Resources by the project proponent and in addition to information obtained during this assignment, have presented the results and conclusion within the associated document to the best of our professional ability.
- Reserve the right to modify aspects pertaining to the present investigation should additional information become available through ongoing research and/or further work in this field.
- Undertake to have our work peer-reviewed on a regular basis.

1.5 Disclaimer

Prime Resources has expressed due and diligent care to comprehensively evaluate the compliance of activities and operations undertaken at the project by the Holder with the stated licence-/s, standard-/s or authorisation-/s against which the audit was conducted, for the period under review. It is noted, however, that the audit relies on findings made during a single site inspection, substantiated with information supplied by the Holder for the period under review. It is assumed that all data provided by Newshelf is true and correct. The possibility is acknowledged that areas of partial and-/or non-conformance were either not observed during the site inspection or did not come to light from a review of the data provided. The onus lies with those responsible to use the precautionary principle to address potential deviations or non-compliances that were not identified in this report and to implement all legislated and permitted license conditions.

The scope of this audit does not include a full legal, Occupational Health and Safety, or Mine Health and Safety compliance audit.

2 PROJECT BACKGROUND

2.1 Location and property description

The Cons Modder Mine is located on the Remaining Extent (RE) of Portion 3 of the Farm Modderfontein 76 IR, near the Brakpan North suburb of Sherwood Gardens, within the City of Ekurhuleni Metropolitan Municipality (CoE), Gauteng (Figure 1).

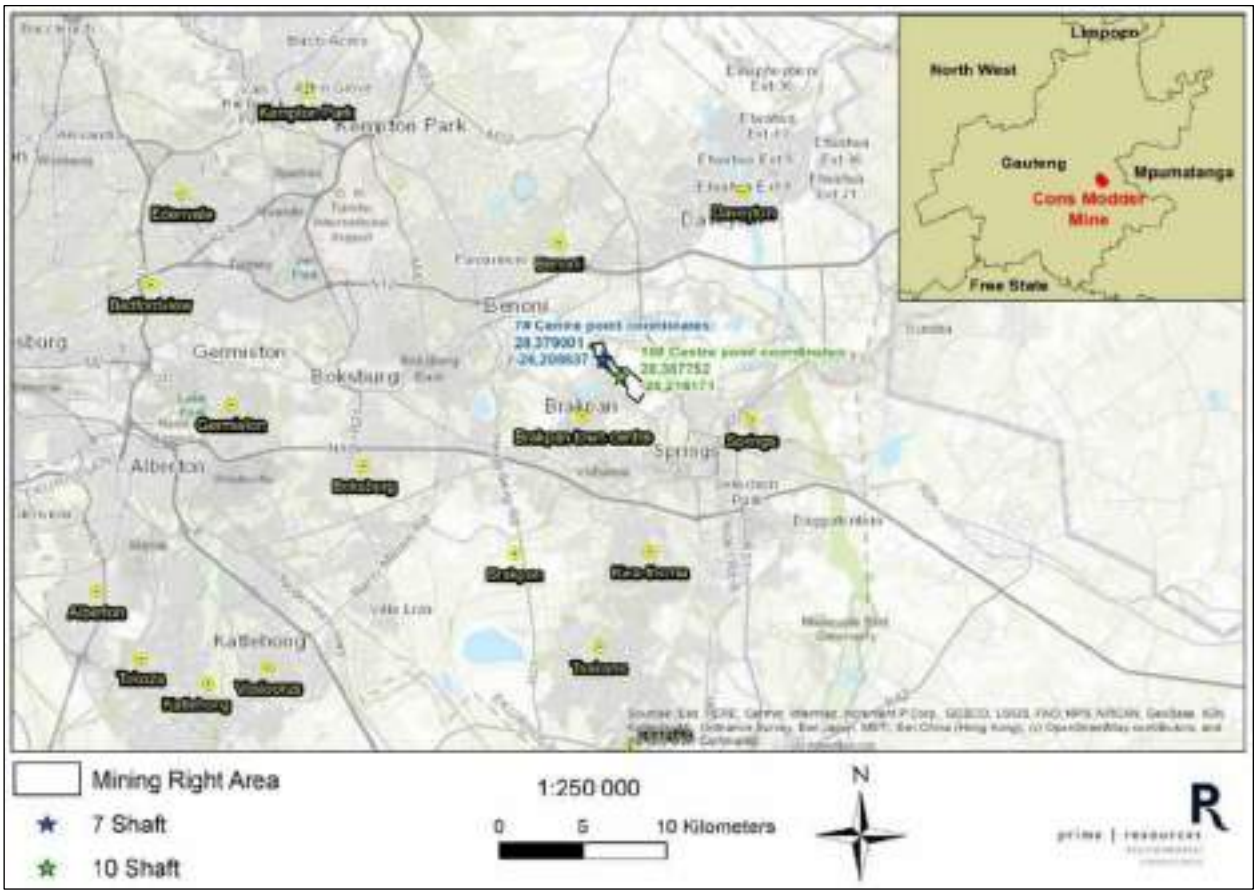

Figure 1. Cons Modder Mine locality map

2.2 Statutory authorisations

Newshelf holds the following authorisations for the Cons Modder Mine:

- Water Use Licence (WUL; ref. no.: 08/C21D/IC/7032) issued by the Department of Water and Sanitation (DWS) on 12 July 2019 for mining activities associated with the Cons Modder Mine
- EA (ref. no.: GP 30/5/1/2/3/2/1 (10061) EM) issued by the DMPR on 7 August 2020
- A Mining Right (MR; ref. no.: GP 30/5/1/2/2/10061 MR) issued by the DMPR on 4 October 2021
- WUL (ref. no.: 10/C21D/CFGIJ/15236) issued by the DWS on 18 September 2024 for the once-off dewatering of the Gedex Pit at the Cons Modder Mine.

An Environmental Impact Assessment (EIA) and EMPr, dated March 2018, were compiled in support of the application for the EA. The EA was granted to Newshelf for activities listed in terms of the NEMA.

2.3 Mining operation description

The Cons Modder Mine targets gold-bearing resources through existing underground mine workings. The mining operation comprises two historical underground shafts, namely Cons Modder 7 Shaft (7#) and Cons Modder 10 Shaft (10#), which are interconnected via underground workings at levels 5 and 10.

The shafts are relatively shallow, with historical mining having commenced at depth of approximately 60 to 150 metres below surface (mbs). Mining activities for the remaining Life of Mine (LoM) will continue within this depth range.

Construction at the historical incline shafts commenced in January 2023. Mining activities commenced at 10# in May 2023, and at 7# in April 2025. The approved LoM for the operation is 10 years as per the approved EIA / EMPr. Mining activities are largely confined to previously disturbed and unrehabilitated historical mining footprints.

The 10# mining area employs approximately 436 workers. 7# employs approximately 93 workers. The mine operates on a two-shift system, commencing at 06:00 and concluding at 18:00. Employees follow a 4 x 4 x 4 rotational schedule, consisting of four night shifts, followed by four day shifts, followed by four days off duty. No blasting or loading activities occur on Sundays; Sundays are reserved for maintenance activities only.

At 7#, approximately 300 tonnes of ore are mined per day. This equates to approximately nine haul truck trips per day from the shaft. At 10#, production comprises both waste rock and ore. Approximately 1 000 to 2 000 tonnes of waste rock are mined per day. Waste rock is used on-site as a capping layer on exposed surfaces. In addition, approximately 1 250 to 1 500 tonnes of ore are mined per day. Six haul trucks operate at 10#, equating to approximately 54 truck trips per day.

Ore is hoisted to surface and transported via the Durban Roodepoort Deep Limited (DRD) haul road and along the Kingsway route to New Kleinfontein Gold Mine's (NKGM) Modder East Operations (MEO) for processing, with tailings disposed of at the MEO Tailings Storage Facility. Refer to Figure 2.

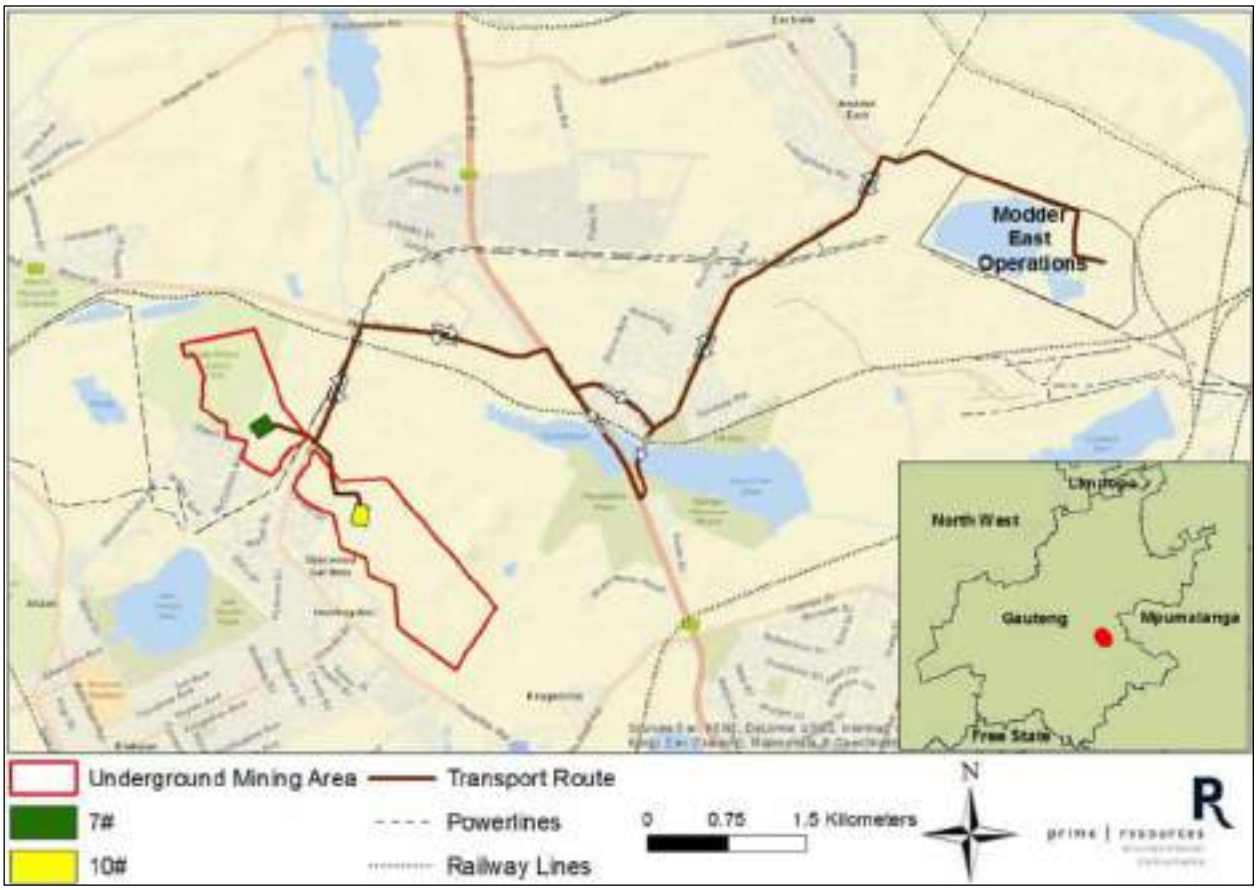

Figure 2. Cons Modder mining and shaft areas and transport route to Modder East Operations

2.4 Infrastructure and project amendments

Several surface infrastructure components have been approved under the existing EA and associated EIA / EMPr in support of underground mining operations at 7# and 10#. The authorised infrastructure includes components applicable to both shafts, as well as certain infrastructure items that may be constructed at either 7# or 10# (but not necessarily at both), depending on operational requirements and the layout assessed as part of the EIA process. The infrastructure authorised under the existing EA includes the following:

- Access roads to the shafts from Hospital Road
- Perimeter fence, gate and security office (for access control)
- Unpaved on-site roads
- Steel headgear
- Headgear bins to allow for storage of ore hoisted at night
- Winder (including electrical equipment, hydraulics and driver's cabin all to be housed in shipping containers
- Substation and power lines for connection to the nearest existing substation
- Diesel generator sets (standby) and compressors
- Potable water storage tank and pipeline for connection to the nearest municipal supply
- Ablution facilities and change houses (linked to municipal sewer, conservancy and / or chemical facilities
- Boot ash areas
- Concrete bank areas
- Covered loading areas

- A drop set operating tower
- Several railway loops for the handling of empty and full cars on a continuous basis
- General waste storage areas (hard-standing area for covered bins / skips
- Stormwater diversion infrastructure (trenches, silt traps and flow diffusing infrastructure)
- Pollution control infrastructure
- Topsoil stockpile
- Enclosed explosive delivery area
- Grout plant
- Workshops and stores
- Laydown areas.

Since the issuance of the EA, the project footprint, infrastructure layout and associated environmental management requirements have changed. In addition to the continued operation of the historical 7# and 10#, a new trackless decline portal has been developed from surface. Additional infrastructure associated with the enlarged footprint includes ventilation shafts (one at 7# [refurbished] and two at 10# [new and refurbished]), expanded access and internal roads, conservancy tanks and wastewater treatment infrastructure, material storage areas, conveyor systems, and ancillary support infrastructure. Certain infrastructure items previously assessed as occurring at either 7# or 10# are now established at both shaft areas, including an additional grout plant and associated silos, settler dams and sand storage areas, and an additional explosive handling area.

The trackless decline portal is located within the historical Gedex Pit adjacent to 10#. 10# functions as a secondary escape route and service shaft for piping and electrical reticulation infrastructure associated with underground operations. Mining activities continue at 7#.

The development of the trackless decline portal and associated surface and underground infrastructure introduce additional activities listed in terms of the NEMA EIA Regulations that are not authorised under the current EA. The revised layout also includes temporary storage of ore and waste rock on surface, which gives rise to waste management licensing requirements in terms of the National Environmental Management: Waste Act (NEM:WA; Act No. 59 of 2008).

Newshelf has applied for a new EA to the DMPR, together with a Section 102 amendment application in terms of the Mineral and Petroleum Resources Development Act (MPRDA; Act No. 28 of 2002) and a Part 4 amendment to the approved EMPr, on 2 August 2024. The new EA application was undertaken through a combined Scoping and EIA process that incorporates the Waste Management Licence (WML) application in terms of the NEM:WA. The final EIA documentation was submitted to the DMPR on 1 April 2025.

A decision on the EA application remains pending at the time of reporting. Development of the decline portal has commenced prior to the issuance of the new EA.

The approved layouts and the construction activities undertaken to date are shown in Figure 3 to Figure 6.

Figure 3. Approved Cons Modder Mine 7# layout

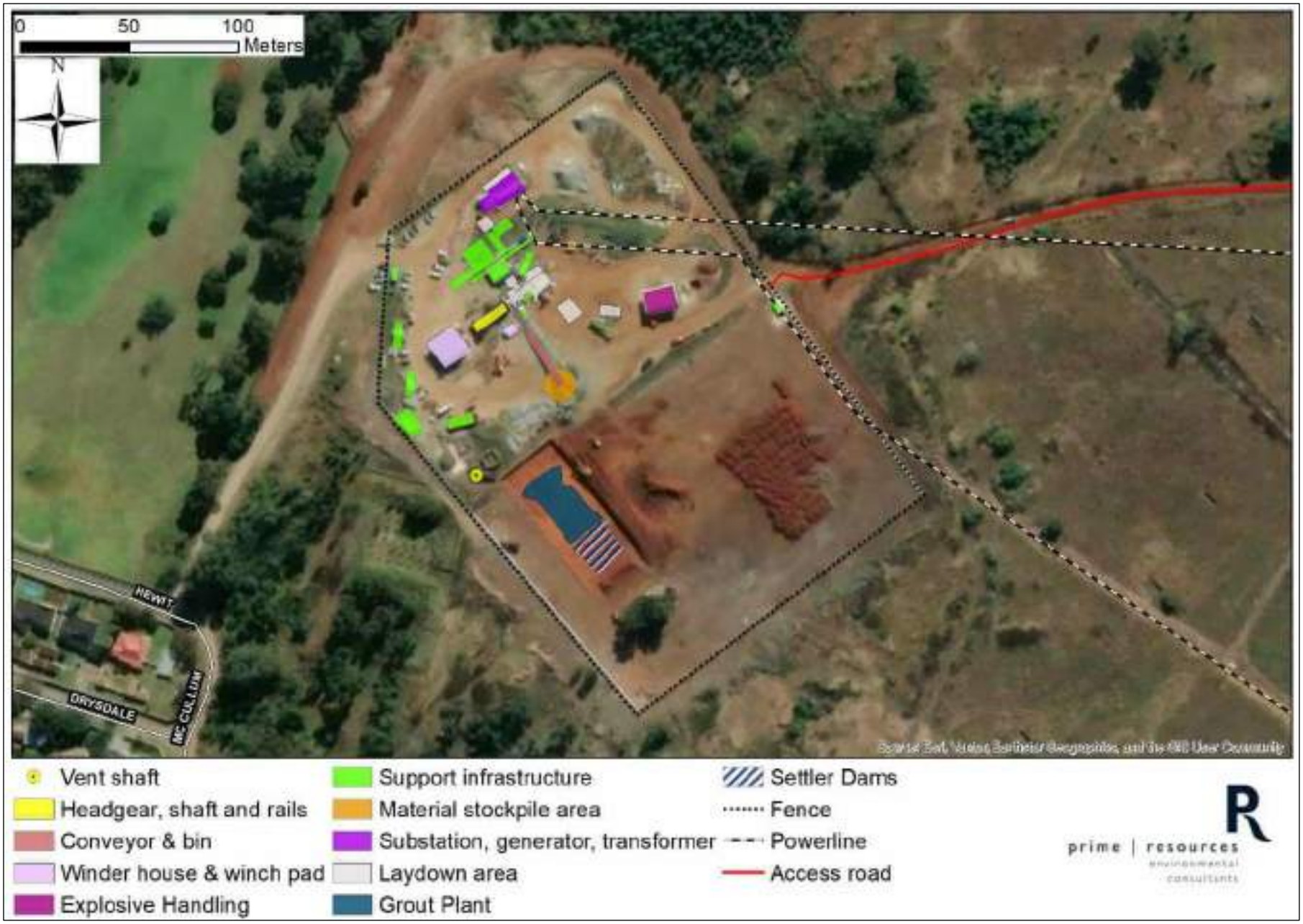

Figure 4. Infrastructure constructed at 7# to date

Figure 5. Approved Cons Modder 10# layout

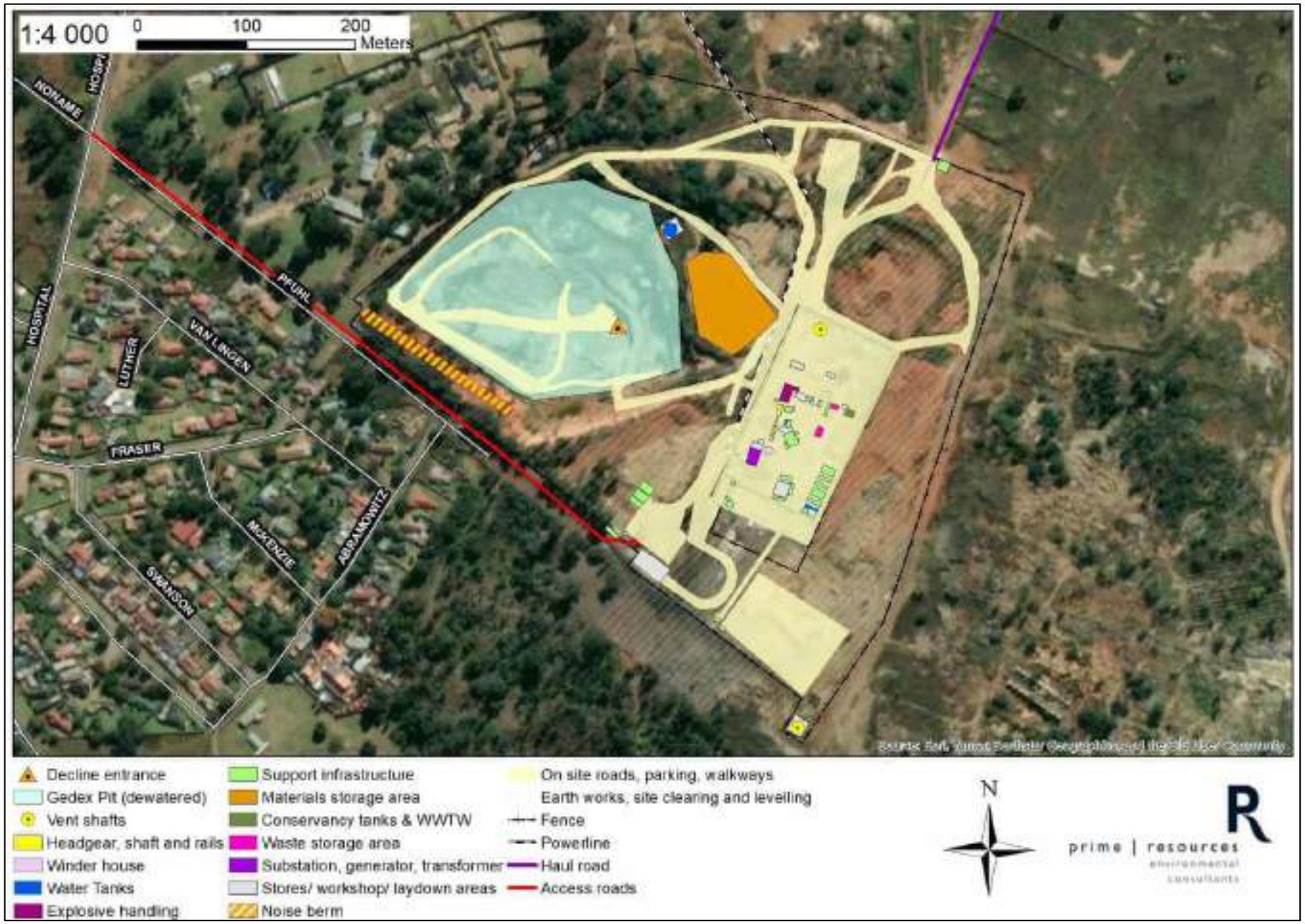

Figure 6. Infrastructure constructed at 10# to date

3 LEGAL FRAMEWORK

3.1 MPRDA and MPRDA Regulations

Previously, Regulation 55 of the MPRDA Regulations (GNR 527 of 2004) addressed the monitoring and performance assessments of the EMPr. However, this was repealed by amendments to the MPRDA Regulations in 2020 (GNR 420 of 2020), indicating that the content of Regulation 55 performance assessments (audits) is now regulated by Regulations 34 to 37 of the NEMA EIA Regulations.

3.2 NEMA and EIA Regulations

The CA for this project is the DMPR, Gauteng Regional Office, regulating in terms of the NEMA and the 2014 EIA Regulations (GNR 982), as amended.

EIA Regulations 34 to 37 (GNR 982 of 2014, as amended) are relevant to the auditing of the EA and the EMPr and are summarised below.

Regulation 34. Auditing of compliance with EA, EMPr and closure plan –

(1) The holder of an EA must, for the period during which the EA, EMPr and closure plan in case of a closure activity remain valid –
   (a) ensure that compliance with the conditions of the EA, EMPr and closure plan, is audited; and
   (b) submit an EAR to the CA (DMPR)

(2) The EAR must –
   (a) be prepared by an independent person with the relevant environmental auditing expertise
   (b) provide verifiable findings, in a structured and systematic manner, on –
      (i) the level of performance against and compliance with the provisions of the EA, EMPr and closure plan;
      (ii) the ability of the measures contained in the EMPr and closure plan to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity
      (iii) contain the information set out in Appendix 7 (see Table 3)
      (iv) be conducted and submitted to the CA at intervals as indicated in the EA.

(3) The EAR must determine –
   (a) the ability of the EMPr and closure plan to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis, and with the closure of the facility
   (b) the level of compliance with the provisions of EA, EMPr and closure plan.

(4) Where the findings of the EAR indicate –
   (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity or
   (b) insufficient levels of compliance with the EA, EMPr or closure plan
   (c) the holder must submit recommendations to amend the EMPr or closure plan to rectify the shortcomings identified in the EAR.

(5) When submitting recommendations, such recommendations must have been subjected to a public participation process, as agreed with the CA and as appropriate to bring the proposed amendment/s to the attention of potential and registered interested and affected parties (IAPs), for approval by the CA.

(6) Within 7 days of submitting an EAR to the CA, the holder of an EA must notify all potential and registered IAPs 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) An EAR must contain all information set out in Appendix 7 to these Regulations.

Table 3. Contents of an EAR in terms of Appendix 7 of the EIA Regulations (2014)

Reference	Requirement	Report reference
3(1)(a)	The EAR prepared in terms of these Regulations must contain details of the- i. Independent person who prepared the EAR; and ii. Expertise of the independent person that compiled the EAR	Section 1.2
3(1)(b)	A declaration that the independent auditor is independent in a form as may be specified by the competent authority	Section 1.4
3(1)(c)	An indication of the scope of, and the purpose for which, the EAR was prepared	Sections 1.3 and 4
3(1)(d)	A description of the methodology adopted in preparing the EAR	Section 5
3(1)(e)	An indication of the ability of the EMPr, and where applicable, the closure plan, to i. Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis ii. Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility in the case of a closure activity; and iii. Ensure compliance with the provisions of environmental authorisation, EMPr, and the closure plan in the case of a closure activity;	Section 8
3(1)(f)	A description of any assumptions made, and any uncertainties or gaps in knowledge	Section 5.4
3(1)(g)	A description of any consultation process that was undertaken during the course of carrying out the EAR	Section 5.5
3(1)(j)	A summary and copies of any comments that were received during any consultation process	Section 5.5
3(1)(k)	Any other information requested by the competent authority	Section 5.5

Regulation 35. Amendment of EMPr or closure plan as a result of an audit –

(1) The CA must consider the EAR and amended documents contemplated in Regulation 34 and approve such amended documents if it is satisfied that it sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity, or in the case of a closure activity, the closure of the facility, and that it has been subjected to an appropriate public participation process.

(2) Prior to approving an amended EMPr or closure plan, the CA may request such amendments to the EMPr or closure plan as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity or to ensure that the closure plan sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the closure of the facility.

Regulation 36 Other amendments of EMPr or closure plan

(1) Where an amendment is required to the impact management actions of an EMPr, such amendments may immediately be affected by the holder and reflected in the next EAR submitted as contemplated in the environmental authorisation and Regulation 34.

(2) Where an amendment to the impact management outcomes of an EMPr or an amendment of the closure objectives of a closure plan in the case of a closure activity is required before an audit is required in terms of the environmental authorisation, an EMPr or closure plan may be amended on application by the holder of the environmental authorisation.

Regulation 37. Amendment of EMPr or closure plan on application by holder of EA

(1) ..... ***[Sub-regulation (1) deleted by GN 326 of 7 April 2017]***

(2) The holder of the EA must invite comments on the proposed amendments to the impact management outcomes or objectives of the EMPr or amendments to the closure objectives of the closure plan in the case of a closure activity from potential IAPs, including the CA, by using any of the methods provided for in the Act for a period of at least 30 days.

(3) Reasonable alternative methods, as agreed to by the CA, to invite comments may be used in those instances where a person desires but is unable to participate in the process due to –

  (a) illiteracy

  (b) disability, or

  (c) any other disadvantage.

(4) The invitation to comment must include an indication that any comments to the proposed amendments must be submitted to the holder of the EA within 30 days of such invitation.

(5) If no comments are received, the holder of the EA may amend the EMPr or closure plan in accordance with its intention and submit the amended EMPr or closure plan to the CA for approval within 60 days of inviting comments.

(6) Prior to approving an amended EMPr or closure plan contemplated in sub-regulation (5), the CA may request such amendments to the EMPr or closure plan as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity or to ensure that the closure plan sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the closure of the facility.

(7) If comments are submitted to the holder of the EA, such holder must submit such comments to the CA, including responses to such comments, together with the proposed amended EMPr or closure plan in the case of a closure activity.

(8) The CA must, within 30 days of receipt of the information consider such information and issue a decision to approve the amended EMPr or closure plan in the case of a closure activity or not.

(9) After the CA has reached a decision, the CA must, within 5 days –

  (a) provide the holder of the EA with its decision, including the amended EMPr or closure plan if the decision was to approve the amended EMPr or closure plan, as well as reasons for the decision

  (b) draw the attention of the holder of the EA to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations

(c) instruct the holder of the EA to, within 14 days of the date of the decision, inform the parties who submitted comments of the decision, to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, if such appeal is available in the circumstances of the decision.

4 PURPOSE AND SCOPE OF THE EAR

The EAR evaluates compliance with the EA issued on 7 August 2020 and the approved EMPr, including the associated EIA dated March 2018 (DMPR ref. no.: 30/5/1/2/2/10061 MR).

A Rehabilitation Plan, dated February 2018, was approved as part of the EMPr. The mine is currently operational, with construction activities having commenced in 2023. Rehabilitation and closure measures are planned to be implemented during the final year of the approved 10-year LoM. As closure and decommissioning activities have not yet commenced, compliance with closure-related measures is not applicable to the current audit period.

4.1 Purpose

In terms of Regulation 34 of the 2014 EIA Regulations, the holder of an EA is required to ensure that compliance with the conditions of the EA and the approved EMPr is audited by an independent person and reported to the CA.

The purpose of this EAR is to provide a structured and systematic evaluation of:

- The level of compliance with the conditions of the EA and the commitments contained in the approved EMPr
- The effectiveness of the EMPr in providing for the avoidance, management and mitigation of environmental impacts associated with the authorised activities
- The need, if any, for amendments to the EMPr to address identified shortcomings or align with changes in site layout or project scope.

This report has been prepared in accordance with Appendix 7 of the EIA Regulations.

4.2 Scope

The scope of the audit includes:

- Review of all applicable EA conditions
- Review of relevant EMPr management measures and commitments
- Evaluation of corrective actions arising from the previous biennial audit
- Consideration of the alignment between authorised activities and infrastructure and those constructed or operational at the time of audit
- Review of environmental monitoring information provided by the holder to support the compliance assessment.

4.3 Reporting requirements

According to Regulation 34 of the NEMA EIA Regulations (2014), the EAR must be conducted and submitted to the CA at intervals as indicated in the EA. The Cons Modder Mine EA requires that an EAR be compiled by an independent specialist and submitted to the DMPR biennially, as required in terms of Section 24Q of the NEMA. The holder is required to notify registered and potential IAPs of the submission and make the report available in accordance with the provisions of the Regulations.

5 ASSESSMENT OF COMPLIANCE

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

- Generation of a checklist containing all the commitments and conditions indicated in the EA and the EMPr
- Assessment of compliance with the commitments and conditions
- A review of relevant documentation
- Interviews with mine personnel, where necessary, to confirm the assessment.

5.1 Audit period

This audit is applicable for the period from November 2023 to February 2026. The previous biennial audit covered the period from December 2021 to November 2023.

5.2 Site inspection

A physical site inspection was undertaken on 11 February 2026 by Monique van der Westhuizen and Louise Jones from Prime Resources. Photographs from the site visit are available in Appendix 3.

5.3 Documents reviewed

The following documentation was reviewed during the current audit.

Table 4. Documentation reviewed

Document title	Date	Author
Environmental Impact Assessment Report and Environmental Management Programme report	March 2018	Prime Resources
Environmental Authorisation	8 August 2020	DMPR
Attendance register – Gedex Internship Shortlisting Presentation	3 March 2025	Gold One Modder East Operations
Financial Guarantee Certificate	27 November 2025	Centriq Insurance Company Limited
Final Rehabilitation, Decommissioning and Closure Plan Incorporating an Annual Rehabilitation Plan and Environmental Risk Assessment for the Cons Modder Mine	May 2025	Prime Resources
Biennial External Water Use Licence Audit for the Cons Modder Mine, Brakpan, Gauteng	July 2025	Prime Resources
Biennial External Water Use Licence Audit for the Emptying and Discharge of Water Within the Open Gedex Pit at the Cons Modder Mine, Brakpan, Gauteng	July 2025	Prime Resources
Attendance register – Stakeholder engagement meeting: Section 102 Gedex	8 October 2025	Gold One Modder East Operations
Attendance register – Gedex Community Meeting	9 October 2025	Gold One Modder East Operations
Minutes of stakeholder engagement meetings – Gedex Mine's SLP commitments	9 October 2025	Gold One Modder East Operations
Minutes of stakeholder engagement meetings – Follow-up on Gedex Mine's SLP commitments	23 October 2025	Gold One Modder East Operations

Document title	Date	Author
Attendance register – Stakeholder engagement meeting of Gedex Mine's SLP commitments	23 October 2025	Gold One Modder East Operations
Mine Health and Safety Inspectorate Inspection Report – Surface and Underground at Gedex 10#haft Head Explosive Delivery Bay	26 November 2025	DMPR
Mine Health and Safety Inspectorate Inspection Report – Shaft Head Explosive Delivery Bay	5 February 2026	DMPR
Detailed Event Report for 1 March 2025 to 28 February 2026	7 February 2026	Gold One Modder East Operations
Proof of Delivery – 13 000 l potable water	10 February 2026	Stern Streamer
Attendance register – Gedex Internship Shortlisting Meeting	15 January 2026	Gold One Modder East Operations
Attendance register – Gedex Internship Shortlisting Meeting	16 January 2026	Gold One Modder East Operations
National Atmospheric Emission Inventory System (NAEIS) – Confirmation of Facility Registration letter	22 January 2026	Department of Forestry, Fisheries and the Environment (DFFE)
Quarterly environmental noise monitoring reports	Q1 2024 (July 2024); Q2 2024 (August 2024); Q3 2024 (January 2025); Q4 2025 (March 2025); Q1 2025 (July 2025); Q2 2025 (September 2025); Q3 2025 (December 2025)	Rayten Engineering Solutions (Pty) Ltd
Monthly ground vibration and air blast monitoring reports (November 2023 to January 2026)	November 2023 (12 December 2023); December 2023 (3 January 2024); January 2024 (12 February 2024); February 2024 (8 March 2024); March 2024 (10 April 2024); April 2024 (10 May 2024); May 2024 (13 June 2024); June 2024 (3 July 2024); August 2024 (5 September 2024); October 2024 (5 November 2024); November 2024 (11 December 2024); December 2024 (6 January 2025); January 2025 (5 February 2025); February 2025 (4 March 2025); March 2025 (2 April 2025); April 2025 (5 May 2025); May 2025 (9 June 2025); June 2025 (1 July 2025); July 2025 (5 August 2025); August 2025 (3 September 2025); September 2025 (3 October 2025); October 2025 (6 November 2025); November 2025 (3 December 2025); December 2025 (8 January 2026); January 2026 (1 February 2026)	Blast Management and Consulting (PTY) Ltd
Biannual Alien and Invasive Monitoring reports (2023 – 2025)	Winter 2023 (August 2023); Summer 2024 (May 2024); Winter 2024 (September 2024); Summer 2025 (February 2025); Winter 2025 (August 2025)	Scientific Aquatic Services (Pty) Ltd
Biannual / Quarterly Aquatic Biomonitoring reports (2023 – 2025)	August 2023: April 2024; February 2025; July 2025; October 2025; December 2025	Scientific Aquatic Services (Pty) Ltd
Monthly Air Quality Monitoring Reports (2023 – 2025)	November 2023; December 2023; January 2025 to December 2025; January 2025 to September 2025; November 2025; December 2025	Rayten Engineering Solutions (Pty) Ltd
Excel sheets: Wish_430_Gedex_ToClient_Jan 2026; Wish_430_Gedex_ToClient_Dec 2025; Wish_430_Gedex_ToClient_Aug 2025;	February 2026; January 2025; October 2025; August 2025; June 2025; May 2025	Groundwater Square Consulting Groundwater Specialists

Document title	Date	Author
Wish_430_Gedex_ToClient_May 2025; Wish_430_Gedex_ToClient_Mar 2025:		
Newshelf, Cons Modder Project, Oct'2024 – Sep'2025 Monitoring Season: Annual Report	May 2025; October 2025	
Newshelf, Cons Modder Project: 2024 Monitoring Results – 4th Quarter; 2024 Monitoring Results – 3rd Quarter; 2024 Monitoring Results – 2nd Quarter; 2024 Monitoring Results - 1st Quarter	December 2024; October 2024; July 2024; April 2024	
Environmental site inspection checklists (either 7# or 10# standalone checklists, or combined shaft checklists)	17 November 2023; 30 May 2024; 24 July 2024; 28 August 2024; 26 September 2024; 29 October 2024; November – December 2024; 9 October 2025; 29 May 2025; July – August 2025; September – October 2025; November – December 2025	Newshelf (Environmental department)
Waste manifests for used oil, scrap metal, and general waste; Calodex Enstra landfill (general waste) receipts; NKGM weighbridge slips	August 2025 – December 2025	Newshelf; Calodex Enstra Landfill; BJB Scrap & Waste Projects;
Waste stream flow chart	-	BJB Scrap & Waste Projects
Newshelf staff organogram	-	Newshelf
Standard procedure: Emergency Response Gedex No. 7 & 10 Shafts	August 2024	Newshelf
Gedex Social and Labour Plan 2020 - 2024	November 2019	Newshelf
Standard policy and procedure: Ordering process for direct and stock purchases	May 2016	Gold One Modder East Operations
Complaints email thread	March 2025	IAP and Newshelf
Complaints email thread	June – September 2025	IAP and Newshelf
Memorandum – Cons Modder (Gedex) Mine Annual Financial Provision Update 2026	March 2026	Prime Resources

5.4 Assumptions, uncertainties, and knowledge gaps

It is assumed that all documentation provided to the auditor is correct and that the holder of the authorisation will correct any inaccurate interpretations of the documentation during the report review process. Where assumptions and uncertainties occurred during the audit, these have been described in the audit checklist (Appendix 1 and Appendix 2). Furthermore, it is noted that:

- The findings recorded in this report are limited to the timeframe during which the audit was undertaken.
- Where insufficient evidence of compliance was provided, the relevant condition was marked as partially or non-compliant until that evidence was produced. Conditions previously rated as partially compliant in earlier audits are considered long-standing and have been classified as non-compliant until fully rectified. In cases where immediate action is not deemed critical, the condition may remain partially compliant based on the auditor's assessment of its urgency.
- No monitoring of environmental conditions was undertaken as part of this audit; all monitoring data reported in this report were supplied by the holder of the authorisation and are assumed to be accurate.

5.5 Consultation and comments received

No consultation with IAPs was undertaken during the process of compiling this audit report. No comments were therefore received from IAPs for inclusion in the report. The DMPR has not requested any specific information to be included in the report.

5.6 Scoring system

The performance of the site is audited in terms of Prime Resources' rating system, with the final score calculated and presented as a percentage. An average compliance score is determined from which the overall compliance percentage is determined.

Table 5. Prime Resource's compliance scoring system

Criteria	Description	Score
Not compliant (NC)	Failure to comply with or satisfy the requirements of a condition / commitment	0
Partially compliant (PC)	Although steps have been taken toward the fulfilment of a condition / commitment, full compliance has not yet been achieved, and further action is required in order to obtain full compliance	1
Compliant (C)	Satisfactory evidence provided to illustrate the fulfilment of a condition / commitment	2
Not audited / not applicable (NA)	The condition is currently not applicable and has not been included in the audit score	-

5.7 Audit findings and compliance results

The external compliance audit identified 58 applicable EA conditions and 175 applicable EMPr commitments. The remaining conditions were considered not applicable and have been excluded from the audit score. Each condition was evaluated for its level of compliance based on a review of the documentation provided by Newshelf, visual observations made by Prime Resources personnel during the February 2026 site visit, and discussions held with representatives of the Cons Modder Mine in February 2026. The individual scores and detailed commentary for each condition of the EA and EMPr are provided in Appendix 1 and Appendix 2, respectively.

Overall, the site is 72.4 % compliant with the applicable conditions of the EA (Table 6), and 76.3 % compliant with the applicable conditions of EMPr (Table 7). The compliance status of the Cons Modder Mine, as well as its previous audit compliance scores, is summarised in Table 8.

Table 6. EA status indicator

Total	Status indicator		Action
85 - 100 %	Green		Minor improvements required
65 - 84 %	Orange	X	Improvements required
0 - 64 %	Red		Major improvements required

Table 7. EMPr status indicator

Total	Status indicator		Action
85 - 100 %	Green		Minor improvements required
65 - 84 %	Orange	X	Improvements required
0 - 64 %	Red		Major improvements required

Table 8. Overall compliance in terms of the EA and EMPr

Description	EA			EMPr		
	Aug 2020 - Dec 2021	Dec 2021 - Nov 2023	Nov 2023 - Feb 2026	Aug 2020 - Dec 2021	Dec 2021 - Nov 2023	Nov 2023 - Feb 2026
No. of auditable, relevant conditions	29	55	58	3	154	175
∑ Total compliance score	56	95	84	6	281	267
Maximum possible score	58	110	116	6	308	350
Compliance percentage	96.6 %	86.4 %	72.4 %	100 %	91.2 %	76.3 %

The reduction in the overall compliance rating relative to the previous audit period is largely attributable to the audit having been undertaken against the existing approved EA, rather than a new EA. The revised EIA and EMPr, prepared to accommodate the expanded project footprint and associated activities, have not yet been approved and are therefore not yet applicable for audit purposes. Compliance was accordingly assessed against the existing approved EA and EMPr.

Compliance with the applicable conditions in terms of the EA and the EMPr is illustrated in Figure 7 to Figure 9.

Updates regarding the previous partial and non-compliances noted during the previous biennial reporting period (December 2021 to November 2023) are summarised in Table 9 and Table 11.Table 10

Newly identified partial and non-compliances for the present audit period (November 2023 to February 2026) are detailed in Table 10 and Table 12. Comments shown in red text indicate recommendations or commitments that require implementation or further attention.

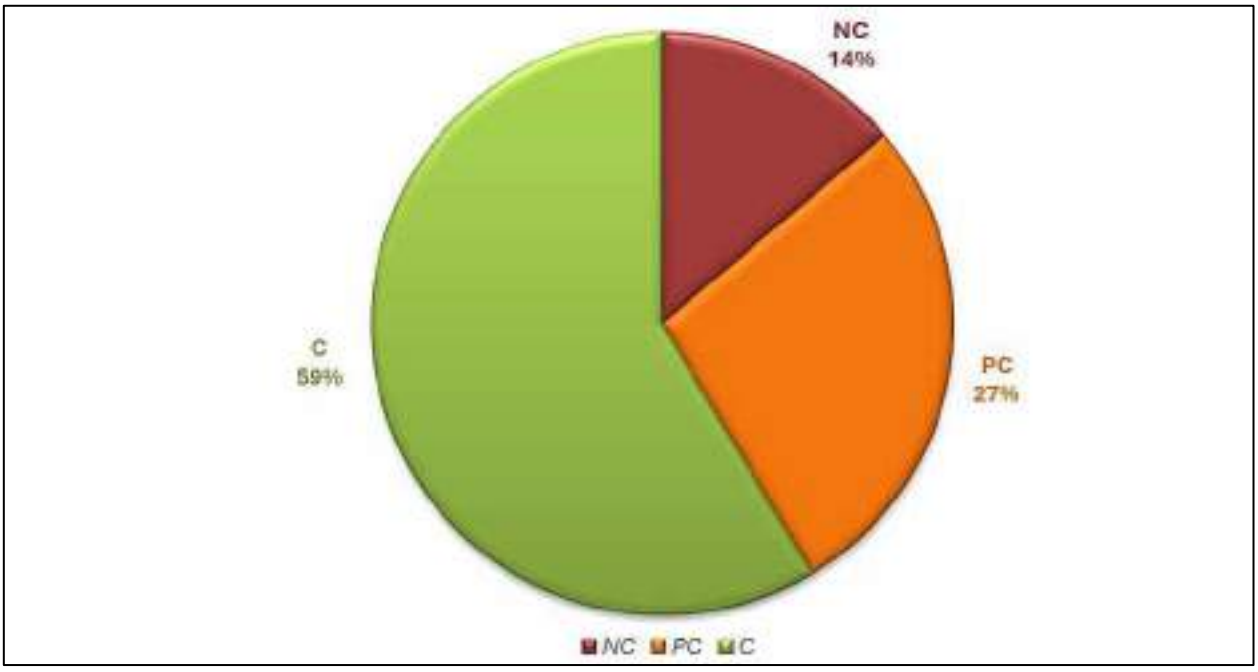

Figure 7. Compliance status of the audited EA conditions (current audit period)

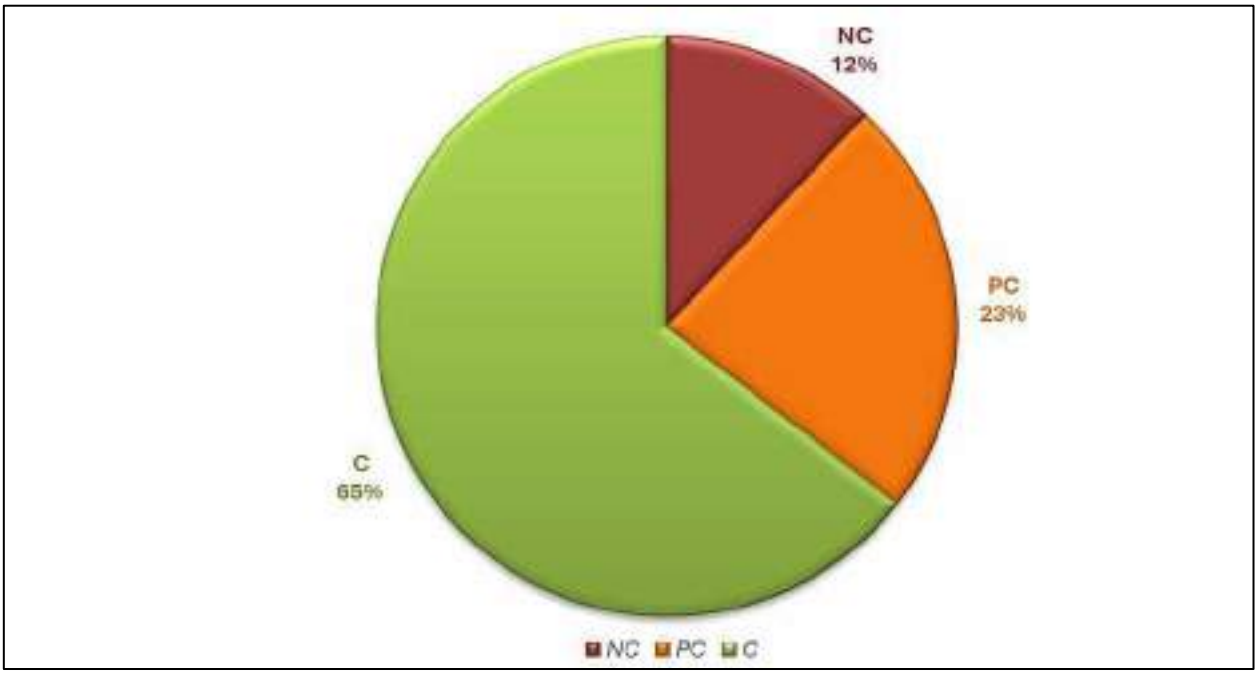

Figure 8. Compliance status of the audited EMPr conditions (current audit period)

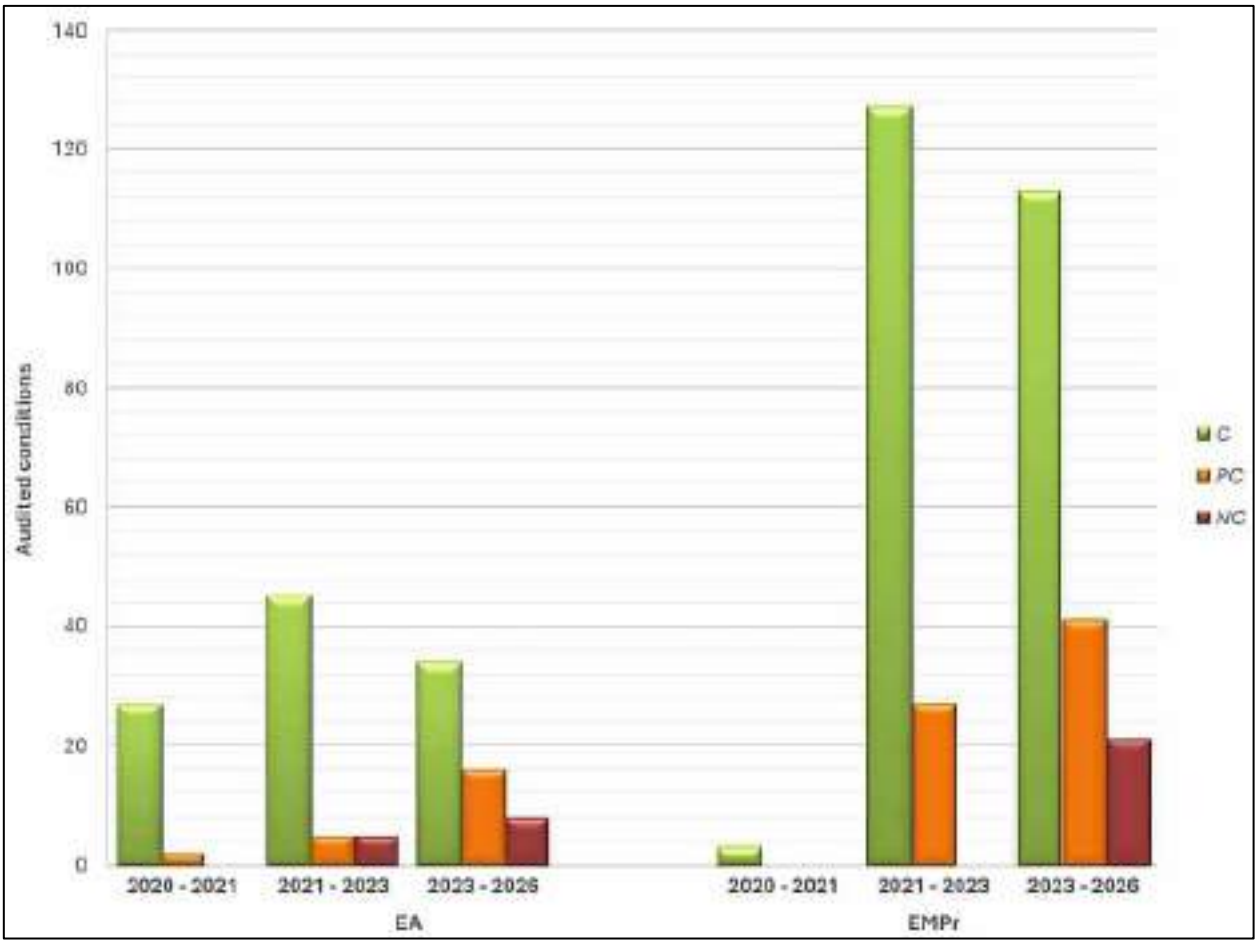

Figure 9. Compliance status of all audited conditions (current and previous audit periods)

Table 9. Follow up on the previous partial and non-compliances in terms of the EA conditions

Ref no.	EA condition	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
Environmental Authorisation Site Specific Conditions					
1.	This Environmental Authorisation (EA) is solely for the listed activities as indicated on pages 2-5 of this document. Listed activities: - GNR983 of 2014, No. 12, 14, 19, 24 and 27 - GNR984 of 2014, No. 6, 17 and 19 - GNR985 of 2014, No. 4, 10, 12, 14 and 15.	PC	The approved layout and current placement of infrastructure on site are not aligned. Since site layout and project description amendments have been identified, an amended EMPr will need to be compiled and submitted for approval. A full scoping and EIA process will need to be followed and the EMPr will need to be updated to reflect where current measures are no longer applicable / not relevant. A WUL amendment will also be required. These processes are underway.	NC	Activities associated with the development of a trackless decline portal via the historical Gedex Pit, together with associated surface and underground infrastructure at 7# and 10#, had commenced during the audit review period. These activities trigger additional listed activities in terms of the NEMA EIA Regulations, 2014. Newshelf has applied for a new EA to the DMPR, together with a Section 102 amendment application in terms of the MPRDA and a Part 4 amendment to the approved EMPr, on 2 August 2024. The new EA application has been undertaken through a combined Scoping and EIA process that incorporates the WML application in terms of the NEM:WA. The final EIA documentation was submitted to the DMPR on 1 April 2025. However, at the time of the audit, written approval of these applications had not yet been issued. Activities beyond those authorised in the existing EA have commenced prior to written approval by the DMPR. The environmental impacts associated with the additional activities have been assessed as part of the submitted amendment applications. Compliance with this condition remains contingent on the outcome of the pending EA amendment process and the implementation of any conditions imposed therein.
1. Scope of Authorisation					
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 deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviation and it may be necessary for the holder of the EA to apply for further authorisation in terms of the EIA Regulations, 2014.	PC	Changes to the project description in the 2018 EIA/EMPr have been identified and an amendment application process needs to be undertaken	NC	The approved EA, issued on 7 August 2020, authorises the operation of the Cons Modder Mine based on the project description, mining method, and infrastructure layout assessed during the 2018 EIA process and detailed in the approved EMPr. Since issuance of the EA, the project footprint, infrastructure configuration, and mining method have evolved. The development activities associated with a new trackless decline portal via the historical Gedex Pit, together with related surface and underground infrastructure at both 7# and 10#, have commenced. Some activities constitute a deviation from the project description approved under the existing EA and trigger additional listed activities in terms of the NEMA EIA Regulations, 2014. Applications for a new EA and a Part 4 amendment to the EMPr, together with a Section 102 application in terms of the MPRDA, have been submitted and are currently under consideration by the relevant competent authorities. The WML application forms part of the combined Scoping and EIA process and is similarly under review. However, at the time of the audit, written approval of these applications had not yet been issued. Accordingly, the requirement that any changes to, or deviation from, the approved project description be approved in writing by the Department prior to implementation has not been fully met.
3. Commencement of Activity					
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 2006), residue deposit and residue stockpile must be deposited and managed in a prescribed manner on any site demarcated for that purpose in the approved EMPr. No person may temporarily or permanently deposit residue stockpile or residue deposit on any area or site other than on site indicated on the approved EMPr.	NC	No mine residue stockpiles or deposits are to be created and no waste rock will be stored or deposited on the site, as per the EMPr, however at the time of the audit, residue material was temporarily stored on surface prior to removal off site. The residue material was stored on the gravel cap. A Part 4 amendment of the approved EMPr in terms of GNR982 Section 37 of the NEMA EIA Regulations (2014), to reflect the latest MWP and updated project description needs to be undertaken. Newshelf must apply for EA and a Waste Management Licence (WML) for the activities which are triggered by the proposed amendments (including the temporary storage of waste rock on site). An application for a WUL amendment will also be submitted to the DWS. A public participation process will be followed to meet the requirements of Chapter 6 of the NEMA EIA Regulations (2014). A full	NC	Low- and high-grade ore material were observed to be temporarily stored on site at 10#, within areas forming part of the expanded project footprint (refer to Appendix 3, photo 13). These storage areas fall outside the originally approved 6 ha surface infrastructure area reflected in the current EA and EMPr. The establishment and operation of these material storage areas trigger listed waste management activities in terms of the NEM:WA, which require a WML. Applications for a new EA and a Part 4 amendment to the EMPr, together with a Section 102 application in terms of the MPRDA, have been submitted and are currently under consideration by the relevant competent authorities. The WML application forms part of the combined Scoping and EIA process and is similarly under review by the DMPR. The required authorisation has not been issued at the time of the audit.

Ref no.	EA condition	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
			scoping and EIA process will be followed and the EMPr will be updated to reflect where current measures are no longer applicable / not relevant and where additional measures are required.		
3.22	The waste storage site must have a firm, impermeable, chemical resistant floor and a roof to prevent direct sunlight and rainwater from getting into contact with the waste.	NC	Skips are used for the storage of general waste, scrap metal and used sorb material (hazardous waste). Non-mine waste removed from underground is stored on surface prior to removal by a contractor. The waste storage area does not have a firm, impermeable, chemical resistant floor and is not covered with a roof.	NC	Waste was observed to be stored in designated skips for general waste, scrap metal and used sorb material (hazardous waste). Designated hydrocarbon storage areas were noted to be bunded and seated on cemented surfaces. However, not all waste storage areas and hydrocarbon storage areas meet the prescribed requirements. Waste skips were observed to be positioned directly on exposed soil without firm, impermeable, chemical-resistant flooring. Not all hydrocarbon storage areas are roofed or positioned on impermeable floors. As a result, waste in certain areas may be exposed to rainfall and environmental conditions, presenting a potential risk of contamination. It is recommended that all waste storage areas be roofed with a firm, impermeable, chemical-resistant floor and appropriate containment measures.
4. Management of Activity (ies)					
4.10	This EA only authorises activities specified in Annexure 1 and a new authorisation must be applied for in respect of any new listed activity not specified as part of Annexure 1. This condition is also applicable in the case of the amendment, addition, substitution, correction, and removal or updating of any detail in the aforesaid EMPr.	PC	The approved layout and current placement of infrastructure on site are not aligned. Since site layout and project description amendments have been identified, an amended EMPr will need to be compiled and submitted for approval. A full scoping and EIA process will need to be followed and the EMPr will need to be updated to reflect where current measures are no longer applicable / not relevant. A WUL amendment will also be required. These processes are underway.	NC	Since the issuance of the original EA (August 2020), the project scope has evolved to include development of a trackless decline portal within the Gedex Pit, expansion of the surface infrastructure footprint from approximately 6 ha to approximately 36 ha, additional diesel storage infrastructure, material stockpiling areas and associated infrastructure. These activities introduce additional listed activities under the NEMA EIA Regulations, which are not reflected in the approved EA. At the time of the audit, development of the decline portal and associated infrastructure had commenced. Applications for a new EA and a Part 4 amendment to the EMPr, together with a Section 102 application in terms of the MPRDA, have been submitted and are currently under consideration by the DMPR. The WML application forms part of the combined Scoping and EIA process and is similarly under review. Accordingly, new listed activities have commenced prior to the issuance of an amended EA. The process to amend water use authorisation requirements has been initiated, and the formal WUL amendment application is anticipated to be lodged during March / April 2026.
4.12	Erosion and soil loss must be prevented by minimizing the reclamation site exposed to surface water run-off.	PC	Erosion prevention measures are still to be implemented, however no obvious signs of erosion are noted at present.	PC	During the audit, areas of the expanded operational footprint were observed to remain exposed, including areas associated with ongoing construction and temporary material stockpiling. While no significant erosion gullies or large-scale soil loss were observed during the physical site inspection, stormwater management infrastructure is not yet fully implemented, and no rehabilitation of completed disturbed areas has been conducted. The presence of exposed soils, combined with temporary ore stockpiling and incomplete stormwater controls, increases the potential for erosion during heavy rainfall events. While active erosion was not observed at the time of inspection, the current extent of exposed disturbed surfaces indicates that full minimisation of erosion risk has not yet been achieved. It is recommended that exposed disturbed areas be progressively stabilised, that temporary erosion control measures (such as diversion berms, contouring or surface stabilisation) be implemented where necessary, and that stormwater controls be prioritised to minimise runoff velocity and soil loss.
6. Site Security and Access Control					
6.2	Weatherproof, 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 EA and the person responsible for the operation of the site.	NC	The signage is weatherproof, durable and legible however not all requisite information is displayed. The signage must be in at least three official languages, state the hours of operation, the name, address and telephone number of the holder of the EA, and the person responsible for the operation of the site.	NC	Entrance signage was observed to be weatherproof, durable and legible. Signage prohibiting unauthorised entry and warning of operational hazards was displayed. However, signage at both shafts did not clearly reflect all required information. such as: - at least three official languages applicable in the area

Ref no.	EA condition	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
					- the stated hours of operation - the full name, address and contact details of the holder of the EA - the name and contact details of the person responsible for the operation of the site It is recommended that entrance signage be updated to include all information required in terms of the EA condition, including multilingual display (minimum three official languages), operational hours, and complete contact details of the holder of the EA and the responsible site manager.
7. Emergency Preparedness Plan					
7.1	The holder of the EA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and or major accident. The plan must, amongst others, include:	NC	Reference to the Emergency Preparedness and Response Plan (EPRP) is made in the EMPr and was reviewed as part of this audit process. A standalone Emergency Evacuation plan for fire has been compiled for the site, however an Emergency Plan still needs to be compiled to cover all of the events listed in the EA. Neither the EPRP in the EMPr or the Emergency Evacuation plan for fire address industrial action. This must included in the standalone EPRP to be compiled for the site.	C	An emergency response plan (ERP) dated 15 August 2024, applicable to the #7 and #10 shafts, is in place and has been reviewed by the auditor. It includes risk factors such as operating errors, mechanical failures, environmental conditions, loss of utility services, and other potential causes. Refer to Appendix 11.
7.1.4	Industrial action	NC	The EPRP in the EMPr and the Emergency Evacuation plan for fire does not address industrial action. This must be included in the standalone EPRP to be compiled for the site.	C	The ERP includes emergency procedures for industrial unrest and strikes.
7.2	The holder of IEA 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.	NC	There is not currently an emergency register for the site. Newshelf must ensure that an up-to-date emergency register is kept during all phases of the operation.	C	The mine has been maintaining a formal electronic incident and event register since March 2025. It records safety, environmental and operational incidents, together with associated proposed corrective actions and responsible persons. The register is updated continuously and was made available for review during the audit.

Table 10. New partial and non-compliances in terms of the EA noted during the current audit period

Ref no.	EA condition	Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations
Environmental Authorisation Site Specific Conditions			
2	The authorised activities will only take place on the geographical locations as per the coordinates indicated on page 5 of this integrated EA.	PC	During the audit period and physical site inspection conducted on 11 February 2026, activities associated with the operation of the historical 7# and 10# were observed to be generally confined to the approved mining right area and within the broader geographical extent assessed under the original EIA. However, development activities associated with the trackless decline portal within the historical Gedex Pit, together with associated infrastructure changes, extend beyond the project description and infrastructure layout assessed in the approved EA. While the Gedex Pit is located within the broader mining area, the specific activities and infrastructure associated with the decline portal are not reflected in the approved coordinates and layout authorised under the existing EA. Applications for a new EA and an amended EMPr, including updated project layouts and geographical extents, have been submitted to the DMPR. At the time of the audit, approval of these amendments remained pending.
6	In relation to the sensitive areas such as wetlands and other associated sensitivities, appropriate buffers as recommended by the specialists on the EIAR must be implemented to minimise or avoid harm to sensitive areas.	PC	During the site inspection, no direct mining activities were observed within the sensitive areas identified in the 2018 EIA. Surface infrastructure and operational activities associated with 7# and 10# were observed to be largely confined to historically disturbed areas. However, it was noted during the site inspection that expanded surface areas associated with the revised project layout have been cleared and disturbed relative to the footprint assessed in the approved EIA and EMPr. These cleared areas form part of the infrastructure associated with the trackless decline portal and related surface works, including activities occurring within the Gedex Pit area. In this regard, certain activities within the pit area were noted to fall within the 500 m regulated zone of the Jan Smuts stream, which was not aligned with the approved layout and associated buffer configurations assessed in the 2018 EIA. While these activities are located within the broader mining area, the approved buffer configurations and specialist-recommended layouts applicable to the original project description are not fully aligned with the implemented layout. Applications for a new EA and an amended EMPr, including updated layouts and reassessment of buffers to sensitive areas, have been submitted to the DMPR. At the time of the audit, approval of these amendments remained pending.
8	The undertaking of the activities authorised, and the operation thereof, requires a Water Use License in terms of section 21 of the National Water Act, 1998 (Act 36 of 1998), therefore a Water Use License must be obtained from the Department of Water and Sanitation prior to commencement with the operation.	PC	Newshelf holds an approved WUL issued by the DWS in terms of Section 21 of the National Water Act, 1998 (NWA; No. 36 of 1998) (Ref. no. 08/C21D/IC/7032), authorising various water uses associated with the original Cons Modder Mine operations. The WUL was issued on 12 July 2019 and was in place prior to the commencement of construction and operational activities at the historical incline shafts in January 2023. A second separate WUL (Ref. no. 10/C21D/CFGIJ/15236), issued in September 2024, authorised the once-off dewatering of the historic Gedex pit. However, water uses associated with the expanded activities were observed to be taking place during the audit period. Subsequent construction activities and changes to the project scope, including the development of the trackless decline portal and expanded surface infrastructure, introduce additional Section 21 water uses that are not authorised under the existing WUL. A WUL application is currently being undertaken to consolidate all water uses; this will be submitted in March / April 2026.
1. Scope of Authorisation			
1.3	The activities which are authorised, may only be carried out at the properties indicated in the EA and or on the approved EMPr.	PC	Activities were generally observed to be taking place on the RE of Portion 3 of the Farm Modderfontein 76 IR, within the approved surface infrastructure area (approximately 6 ha) associated with the existing Cons Modder Mine. However, development activities associated with the trackless decline portal and related infrastructure form part of a revised project description that provides for an expanded surface infrastructure footprint of approximately 36 ha, inclusive of infrastructure at 7# and 10#, access roads, and power line servitudes. Infrastructure associated with the revised project description, including a developed haul road, extends onto Portion 64 of the Farm Modderfontein 76 IR. These expanded areas and additional properties are not authorised under the existing EA and EMPr. Applications for amendment of the EA and EMPr, incorporating the revised project description, expanded surface footprint and additional properties, have been submitted to the DMPR. At the time of the audit, approval of these amendments remained pending.
1.4	Where any of the holder of the EA contact details change including the name of the responsible person, physical / postal address or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA.	PC	No changes to the responsible person or telephonic contact details were identified during the audit review period. However, the postal address of the holder differs from that reflected in the EA, and formal notification of this change has not been provided to the Department. It is recommended that Newshelf provides formal notification to the DMPR of the updated postal address, in accordance with the EA's requirements.
1.5	The EA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the undertaking of such activities.	PC	Newshelf holds and maintains several statutory authorisations relevant to the Cons Modder Mine, including a valid MR and an approved WUL. Compliance with a range of applicable legislative requirements was reviewed during the audit, including obligations arising from environmental, water, waste, and mining legislation. However, as documented in this audit, certain activities associated with changes to the project scope and infrastructure layout have been implemented in advance of relevant approvals, including a new EA, an amended EMPr, and additional waste-related approvals. These matters indicate that compliance with all applicable statutory requirements has not been fully achieved at the time of the audit.
3. Commencement of activity			
3.4	Vegetation clearance must be limited to areas where the individual activity will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.	PC	Vegetation clearance has been observed within areas associated with both the original infrastructure footprint and expanded surface infrastructure linked to the development of the trackless decline portal and associated works. Clearance within the originally authorised footprint is consistent with the approved EA and EMPr; however, additional cleared areas form part of the revised project description currently subject to approval.

Ref no.	EA condition	Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations
			Limited stormwater management measures were observed on site, consisting primarily of a berm constructed around the pit area. No significant active erosion was observed at the time of inspection; however, disturbed and cleared areas present a potential erosion risk if not adequately managed. Alien Invasive Plants (AIPs) are present on site, particularly within expanded and previously cleared areas at 10#. AIP monitoring is undertaken seasonally (winter and summer) (Refer to Appendix 7). It was reported by Newshelf that AIP control forms part of general site maintenance activities, including grass cutting and weeding, which were observed during the inspection. AIPs are not physically removed but are managed through herbicide application as part of routine vegetation control. It is recommended that additional erosion mitigation measures be considered within newly disturbed areas to minimise erosion risk, and that documented control measures be maintained to prevent further spread of AIPs, including appropriate disposal of cleared AIPs to prevent re-establishment or spread. For more effective and efficient control of AIPs, Newshelf should address AIPs as per the management measures identified in the site-specific AIP Control Plan.
3.5	Topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.	PC	No evidence was observed of topsoil or subsoil being stockpiled within drainage lines or in areas likely to obstruct surface water flow, and no obvious contamination of soil stockpiles was observed at the time of inspection. Minor hydrocarbon spillages were noted at unsurfaced operational areas; these were localised and did not appear to affect any defined topsoil stockpiles. Preventative measures aimed at minimising soil contamination risk were observed to be in place, including the use of spill kits, designated refuelling and maintenance areas, and dedicated hydrocarbon storage areas (Refer to Appendix 3, photos 35, 36, 38, 39, 41, 42, 46, 47, 63, 65, 66 and 81). The hydrocarbon storage areas are bunded and seated on concrete surfaces. However, some waste and hydrocarbons were directly stored onto soil (Refer to Appendix 3, photos 21 and 43). Waste is stored in skips on site; however, certain waste storage areas do not have firm, impermeable, chemical-resistant flooring. No drip trays were observed beneath stationary machinery and equipment where hydrocarbon leakage onto bare soils exists (Refer to Appendix 3, photos 7, 25, 27, 28, and 76). Some oil drums were placed directly on the soil surface, while others were positioned on wooden pallets resting on soil (Refer to Appendix 3, photo 43). Wood shavings (organic absorbent material) were observed to be applied around hydrocarbon storage drums for spill control. The storage area is not situated on an impermeable, bunded surface. While absorbent material is available and used, the current arrangement does not fully prevent potential infiltration of hydrocarbons into the subsoil. Intermediate Bulk Containers (IBCs) were observed to be elevated on supporting structures; however, some were noted to be leaking, presenting a potential contamination risk. Refer to Appendix 3, photos 21, 25, 27, 28, 32, 43, 64, and 67. It is recommended that all hydrocarbon storage and handling areas be standardised to include firm, impermeable, chemical-resistant surfaces with appropriate bunding or secondary containment. Drip trays should be installed beneath stationary machinery and equipment, and all drums and IBCs should be stored on impermeable surfaces with adequate containment. Any leaking containers should be repaired or replaced without delay. A formal spill and clean-up register should be maintained on site to record the date and location of each spill, the substance and estimated volume involved, the remedial measures implemented, any disposal actions undertaken, and the responsible person, thereby ensuring auditable evidence of spill management and compliance with the Hydrocarbon Management Plan and EA requirements.
3.13	Hydraulic fluids or chemicals required during the operation must be stored in a concrete lined surface with bund walls and must be designed in such a manner than any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur they must be cleaned immediately by removing spillage together with the polluted solids and disposed of in the authorised disposal site permitted for 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.	PC	Dedicated hydrocarbon storage areas were observed to be appropriately bunded and seated on concrete surfaces, providing containment. Spill kits were observed to be available on site and accessible within operational areas to facilitate immediate response to minor spill incidents. Refer to Appendix 3, photos 35, 36, 38, 39, 41, 42, 46, 47, 63, 65, 66 and 81. However, inconsistent storage practices were also noted. Some oil drums were placed directly on soil surfaces, while others were stored on wooden pallets resting on soil. Wood shavings (organic absorbent material) were observed to be applied around hydrocarbon storage drums for spill control. The storage area is not situated on an impermeable, bunded surface. While absorbent material is available and used, the current arrangement does not fully prevent potential infiltration of hydrocarbons into the subsoil. IBCs were observed to be elevated above ground level; however, some were noted to be leaking. Stationary plant and equipment were observed without drip trays, increasing the risk of localised soil contamination. Minor spillages were observed during the audit and were reportedly addressed through clean-up procedures. Refer to Appendix 3, photos 21, 25, 27, 28, 32, 43, 64, and 67. According to Newshelf, no significant spill event occurred during the audit period that would have required notification to the DWS. It is recommended that all hydraulic fluids and chemical storage areas be standardised to include concrete-lined surfaces with appropriate bunding and secondary containment. Leaking containers should be repaired or replaced immediately, and drip trays should be installed beneath stationary plant and equipment. Spill response actions should continue to be implemented and formally recorded.
3.14	The holder of EA must ensure that any water uses listed in terms of section 21 of National Water Act, 1998 (Act 36 of 1998) get authorization from Department of Water and Sanitation prior to the commencement of such activity (ies).	PC	Newshelf holds an approved WUL (ref. no.: 08/C21D/IC/7032), issued by the DWS in July 2019, authorising various water uses associated with the Cons Modder Mine operations. This licence was in place prior to the commencement of construction and operational activities at the historical shafts in January 2023. A second separate WUL (Ref. no. 10/C21D/CFGIJ/15236), issued in September 2024, authorised the once-off dewatering of the historic Gedex pit. However, activities associated with the development of the trackless decline portal introduce additional Section 21 water uses that are not authorised under the existing WUL; therefore, water use activities have commenced prior to the issuance of the required WUL. A WUL application is currently being undertaken to consolidate all water uses; this will be submitted in March / April 2026.
3.23	The commissioning and decommissioning of individual activity within the overall listed activities must take place within the phases and timeframes as set out in the EMPr.	PC	The approved EMPr (2018) describes the phased development of the Cons Modder Mine based on the project description at the time, which included re-equipping and operating the historical 7# and 10# within a defined surface footprint. Subsequent to approval of the EA, the project scope evolved to include development of a trackless decline portal within the Gedex Pit and expansion of the surface infrastructure footprint from approximately 6 ha to approximately 36 ha. These expanded activities and associated phasing are not reflected in the currently approved EMPr. Therefore, commissioning of certain activities has occurred outside the phases and timeframes set out in the approved EMPr. Applications for a new EA and an amended EMPr, together with associated regulatory approvals, have been submitted and are pending decision. Finalisation of these processes is required to regularise alignment between operational phasing and the approved EMPr.

Ref no.	EA condition	Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations
3.24	The listed activities, 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 finalised.	PC	The EA was issued in August 2020, and construction of authorised activities at the Cons Modder Mine commenced in January 2023, well beyond the 20-day period following notification of the decision. Based on information made available to the auditors, no appeal was lodged against the EA that would have resulted in the suspension of the authorisation. Therefore, the commencement of listed activities did not occur within the restricted period, and no activities were undertaken during a period of suspension of the EA. However, activities associated with the development of the trackless decline portal and related infrastructure were implemented during the audit period, resulting in an expansion of the surface infrastructure footprint to approximately 36 ha. These activities form part of a revised project description that has not yet been authorised through an EA. As no decision has been issued in respect of the amended project, registered IAPs were not afforded an opportunity to lodge an appeal in relation to the expanded footprint and associated listed activities prior to commencement of works. Listed activities associated with the expanded project footprint were undertaken without the procedural requirements relating to notification and appeal opportunity being undertaken.
4. Management of activity (ies)			
4.3	Regular monitoring and maintenance of storm water drainage facilities must be conducted at all times and if damaged, they must be repaired as directed by the Department of any other relevant authority.	PC	No formal engineered stormwater drainage system or dedicated dirty water management infrastructure had been implemented across the site. An earth berm has been constructed around the Gedex Pit to manage surface runoff and limit inflow. No significant erosion, structural failure or damage to this berm was observed during the site inspection. Ore material is temporarily stockpiled on site prior to off-take for processing (Refer to Appendix 3, photos 13 and 73). The presence of stockpiled material increases the risk of sediment-laden and uncontrolled stormwater runoff during rainfall events. Effective stormwater and dirty water containment measures are therefore necessary to prevent erosion and potential pollution. According to Newshelf, additional stormwater management measures, including the construction of sumps within the pit and installation of a culvert along the haul road, are planned as part of the ongoing development works. While the mine remains partly in its construction phase, mining activities have commenced, and the project footprint has expanded. As such, effective stormwater and dirty water management should be prioritised to prevent uncontrolled runoff, erosion and potential pollution of surrounding areas, in accordance with Section 28 of the NEMA (duty of care) and Section 19 of the NWA (pollution prevention). Ongoing visual inspection and maintenance of the existing berm and drainage pathways should continue, particularly during and after heavy rainfall events. It is recommended that the planned stormwater control measures be implemented as a priority and that a formal stormwater inspection and maintenance schedule be established and documented. Stormwater and dirty water management infrastructure should be aligned with the current operational footprint and associated risks.
4.4	A buffer zone of 100 metres between the activity (ies) and the residential areas must be clearly demarcated and maintained.	NC	The Cons Modder Mine is located in proximity to residential areas, including Sherwood Gardens. Perimeter fencing and access control measures are in place to separate operational areas from surrounding properties. Ore hauling associated with the mining activities at the decline shaft was observed to be occurring within 100 m of residential properties in Sherwood Gardens and in proximity to the Golan Shooting Range. The expanded operational footprint has resulted in certain mining-related activities being undertaken within the prescribed buffer distance. The required 100 metre buffer between operational activities and adjacent residential areas is not being maintained.
4.5	The holder of the EA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards.	PC	The EMPr provides measures aimed at reducing nuisance conditions and potential health hazards. An environmental monitoring programme is being implemented at site. Monitoring undertaken during the audit period includes ambient air quality monitoring, blasting monitoring (ground vibration and air blast), noise monitoring, groundwater monitoring, surface water monitoring, aquatic biomonitoring, aquatic toxicological assessments, and AIP monitoring. A complaints register is maintained at the entrance gate of 10#, and no formal environmental complaints were recorded at the register during the audit period. Communication mechanisms are in place with the surrounding community representatives regarding blasting activities. However, complaints and concerns regarding noise, dust, odours, standing water, and a general decline in living conditions were submitted by surrounding residents via email during the audit period. While no excessive dust, noise or odours were noted during the physical site inspection, the complaints indicate that surrounding receptors have experienced or perceived nuisance impacts associated with the operation. Dust suppression measures were observed at 10# on the day of inspection. Rodent control bait stations were observed at strategic locations at both 7# and 10#. Refer to Appendix 3, photos 20 and 29. In addition, stagnant greywater was observed in the vicinity of the change rooms. Refer to Appendix 3, photos 18 and 19. Newshelf has indicated that these change houses are scheduled to be relocated. In addition, certain infrastructure controls, including stormwater management and waste storage facilities, require improvement. Operational activities are also occurring within 100 metres of residential receptors. It is recommended that the stagnant greywater observed near the change rooms be addressed as a priority to prevent nuisance conditions and possible vector breeding. Interim drainage or containment measures should be implemented pending relocation of the change houses. It is further recommended that all community complaints and concerns, including those received via email or other communication platforms, be formally recorded in a consolidated complaints register and tracked to closure. Stormwater and waste management infrastructure should also be upgraded and formalised in accordance with the EMPr to reduce the risk of nuisance impacts, particularly given the proximity of operational activities to residential receptors. Ongoing review of environmental monitoring data and community feedback should continue to ensure that any emerging nuisance conditions are identified and addressed proactively.
5. Reporting to the Department			
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.	PC	A complaints register is maintained at the entrance gate of 10#. No formal environmental complaints were recorded at the site register during the audit period. Communication mechanisms are in place with surrounding communities via a dedicated WhatsApp communication group involving community representatives. A formal grievance mechanism is managed through Gold One. However, complaints and concerns regarding noise,

Ref no.	EA condition	Current audit period November 2023 - February 2026	
		Compliance	Comments / Recommendations
			dust, odours, standing water, and a general decline in living conditions were submitted by surrounding residents via email during the audit period. A documented complaint management and close-out process was also not available for audit review. It is recommended that such a process be compiled and implemented. It is further recommended that the surrounding communities be informed of the grievance mechanism and how to lodge a complaint.
7. Emergency preparedness plan			
7.1.2	Spillage	NC	The ERP does not include spillages. It is recommended that the ERP be updated to include spills.

Table 11. Follow-up on the previous partial and non-compliances in terms of the EMPr conditions

Ref no.	Aspect	EMPr management measure	Responsible party	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
				Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
Air Quality Management Plan							
Air Quality Management Measures							
Construction Phase							
AQM 9	Exposed areas	Use of chemical dust suppressants and windbreaks must be implemented prior to re-vegetation.	ECO / Construction manager	PC	Chemical dust suppressants are not being used as yet. A gravel cap has been constructed at 10# to manage dust levels. No artificial wind breaks have been constructed, however vegetation surrounding the shaft areas has been left in place as a wind break. Dust levels appear to have increased from a visual perspective at 7# as a result of the earth moving and levelling activities. This needs to be confirmed from the dust monitoring and if required the dust levels must be managed through watering or a dust suppressant.	PC	No re-vegetation activities were taking place on site. Chemical dust suppressants are not being used as yet. Dust management measures are nevertheless being implemented. A gravel cap of crushed waste rock has been constructed in certain high-traffic areas, including the parking area and around office infrastructure at 10#, to reduce dust generation. In addition, a water bowser utilising borehole water is used (as of August 2024) for dust suppression along exposed roads. Vegetation outside the fenced shaft areas remains in place and provides some natural buffering. Monthly dust monitoring is being undertaken at the site by a third party. It is recommended that chemical dust suppressants be utilised as per this EMPr.
AQM 13	Unpaved roads	A gravel cap must be applied to the road surface of unpaved roads.	ECO / Construction manager	PC	A gravel cap within the fenced-off area of #10 shaft has been constructed. The other unpaved roads do not have a gravel cap as yet due to ongoing landowner issues.	PC	A gravel cap has been applied in certain high-traffic areas, including around the parking area and office infrastructure at 10#. Dust suppression measures, including the use of a water bowser, are also implemented on exposed roads. However, gravel surfacing has not been consistently applied across all unpaved roads within the expanded operational footprint. It is recommended that gravel surfacing be extended to the remaining high-traffic unpaved roads within the operational footprint to further reduce dust generation risk. Roads within the pit should be prioritised, given their proximity to residential areas.
AQM 14	Weather stations	A weather station must be installed on site to at least monitor wind speed and direction, and rainfall, to assist with interpretation and understanding of the monitoring results. The wind speed and direction sensor should be installed at an approximate height of 10 m above the ground.	ECO	PC	There is a rain gauge at 10#. PM_{10} monitoring units have been installed at both shafts and these units will also monitor the wind speed/wind direction, however the units are not located 10 m above the ground. A weather station must be installed.	C	Rainfall monitoring was confirmed through the presence of a rain gauge at 10#. The PM_{10} monitoring units installed at both shafts record wind speed and wind direction data, which are used to support the interpretation of ambient particulate monitoring results. Although the wind sensors are not installed at an approximate height of 10 m above ground level, they were installed as part of the specialist air quality monitoring setup and are considered appropriate for the purpose of site-based particulate monitoring. The current monitoring arrangement is therefore regarded as compliant, as meteorological data are being collected and used to support interpretation of the air quality results. It is recommended that the EMPr requirement specifying installation at approximately 10 m above ground level be reviewed and amended.
AQM 15	Bin and truck loading	Sheltering measures must be implemented (i.e. enclosing the chute), to ensure that particulates are contained during ore hoisting and truck loading.	ECO / Construction manager	PC	Material hoisting and truck loading infrastructure has been constructed at 10# in the form of the chute and bunded/ walled ore bin. Negligible dust is currently being created due to tipping activities and particulates are contained during hoisting and truck loading. No further sheltering is planned, and this condition should be amended to state that sheltering measures must be implemented as required if particulates exceed required standards.	NC	Ore hoisting and truck loading activities were observed at surface. No fully enclosed loading chute or dedicated sheltering structure designed to contain particulate emissions during loading was identified. Ore loading activities occur within the open operational area. Dust suppression measures (including a water bowser and gravel surfacing) are implemented on site. It is recommended that the ore transfer and truck loading arrangements be reviewed to incorporate appropriate enclosure or sheltering measures (e.g., chute enclosure, skirting, or covered loading structure) to reduce fugitive dust emissions during loading operations, or that the requirement be formally addressed through the EMPr amendment process.
Biodiversity Management Plan							
Biodiversity Management Measures							
Construction And Operation Phases							
BDM 11	Alien invasive plant species monitoring	Alien vegetation must be removed and monitored as per the Alien and Invasive Control Plan from the area during all phases of the development, with specific mention of Category 1b species in line with the	ECO / Botanist	PC	Bi-annual alien species invasion monitoring is carried out. The proliferation of AIP species within the study area is considered to be	PC	AIPs are present on site, particularly within expanded and previously cleared areas at 10#. AIP monitoring is undertaken seasonally (winter and summer) (Refer to Appendix 7). It was reported by Newshelf that AIP control forms part of general site maintenance activities, including grass

Ref no.	Aspect	EMPr management measure	Responsible party	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
				Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
	and management	NEMBA Alien and Invasive Species Regulations (2016). Special attention should be paid to alien and invasive plant control within areas compacted as a result of construction activities.			moderate and the control of AIPs has been undertaken, however AIPs are still present at 7#.		cutting and weeding, which were observed during the inspection. AIPs are not physically removed but are managed through herbicide application as part of routine vegetation control. It is recommended that routine AIP control activities be formally documented and supported by basic recordkeeping. Records should include dates of maintenance, areas treated, methods applied (e.g. herbicide use), and responsible personnel. For more effective and efficient control of AIPs, Newshelf should address AIPs as per the management measures identified in the site-specific AIP Control Plan.
Noise Management Plan							
Noise Management Measures							
Construction Phase							
NM 2	Noise barrier	Where possible earthworks and material stockpiles should be placed so as to protect the boundaries from noise from individual operations and, which for greatest effect should be placed directly behind them. If a levee is constructed, it should be of such a height as to effectively act as a noise barrier (line of sight). In particular, stockpiles should form a berm to the south surrounding hoisting and loading areas to a height of approximately 1 m above the delivery end of the conveyor.	ECO / Construction manager	PC	Construction activities are still underway. No berms are planned and this condition should be amended based on the findings of the noise measurements/ monitoring to construct berms if noise levels exceed requirements.	NC	Ore stockpiles are present near the conveyor deposition area at 7#; however, their placement appears operational (associated with the chute-to-conveyor system) rather than intentionally configured for acoustic shielding. At 10#, low-grade and high-grade stockpiles are located at the pit edge for operational storage but are not positioned to protect residential boundaries from hoisting and loading noise. While the pit topography may provide some degree of natural attenuation, it does not constitute a purpose-designed noise berm. Considering the recorded noise exceedances reported in the quarterly monitoring reports, additional engineered noise control measures should be implemented in accordance with the recommendations of the noise monitoring report.
Construction, Operation and Decommissioning Phases							
NM 8	Fixed noise sources	Reduce noise at source by acoustic treatment, etc. Isolate bin and chute by an acoustic enclosure, etc. Compressors and generators should be installed in separate acoustically treated buildings.	ECO / Construction / Site manager	PC	The ore chute has been constructed and is in use. The low height and gentle angle of the chute prevent excessive noise. Lining has been fitted to the ore chute to reduce noise. A roof has been constructed over the water tank and compressor. Piping for the electric compressor (lower noise) is being constructed. A new generator has been installed, which operates with lower noise output. No sheltering is planned and this condition should be amended based on the findings of the noise measurements/ monitoring to construct berms if noise levels exceed requirements.	NC	The ore chute has been constructed and is operational. According to Newshelf, the design incorporates a relatively low height and gentle angle to reduce impact noise, and a lining has been fitted within the chute to attenuate noise. A roof structure has been constructed over the water tank, compressor installations, and diesel generators. These fixed noise sources are not installed within fully acoustically treated enclosures as contemplated in the EMPr. No purpose-built acoustic isolation of the bin and chute system was observed beyond the internal lining and general structural measures. Quarterly noise monitoring indicates that exceedance of applicable noise standards is occurring at certain monitoring locations. Exceedances were attributable to mining activities, including ventilation fans, conveyor operations, crushers and loaders. Due to the proximity to residential areas, the recommendations as per the noise monitoring programme should be implemented. The noise monitoring report recommends, inter alia, the installation of noise barriers (e.g. earth berms) around high-noise areas, erection of 4 m high barriers around both shaft areas, restriction of high-noise operations during night-time hours, continued quarterly monitoring, and maintenance of a noise complaint register with stakeholder engagement.
NM 12	Bin and truck loading	Enclose the hoist and tipping area with IBR or similar panel. In critical situations these areas can be lined with an absorbent layer held in place by expanded metal or similar to absorb noise locally and further reduce radiated noise.	ECO / Construction / Site manager	PC	The winder house at 10# is enclosed in IBR sheeting. The ore hoist and tipping area is bermed but does not have an enclosure/ roof. No sheltering is planned, and this condition should be amended based on the findings of the noise measurements/ monitoring to construct berms if noise levels exceed requirements.	NC	At 7#, the hoist/winder installation is enclosed, providing attenuation of mechanical hoisting noise (refer to Appendix 3, photo 75). The surge bin structure is also enclosed. However, the tipping/transfer point associated with the conveyor discharge and stockpile area is not enclosed with Inverted Box Rib (IBR) or equivalent cladding (refer to Appendix 3, photos 73 and 74). No localised absorbent lining was observed at impact zones. At 10#, the hoisting and truck loading area is located within the open Gedex Pit and remains fully exposed (refer to Appendix 3, photos 9 and 11). No IBR enclosure or localised acoustic lining was observed around the tipping or loading area to mitigate radiated noise.

Ref no.	Aspect	EMPr management measure	Responsible party	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
				Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
							It is recommended that the enclosure of tipping and transfer areas be formally assessed for both 7# and 10#.
NM 16	Corrective actions	Should monitoring indicate that monitoring objectives are not being met corrective actions must be implemented within a month of the monitoring report being issued to ensure that monitoring objectives are met.	ECO	PC	Noise monitoring on certain pieces of equipment has been undertaken and no corrective actions are required. Noise monitoring on site is carried out every 6 months or when changes are made. Warning signage with regard to noise levels is in place and ear protection has been given to all employees on site. Additional noise monitoring to be implemented as needed. Environmental noise monitoring needs to be conducted on a quarterly basis from the operational phase, which has commenced at 10#, throughout the LoM.	NC	Quarterly ambient noise monitoring conducted by Rayten Engineering Solutions (Pty) Ltd identified exceedances of the applicable urban noise limits at certain monitoring locations during the reporting period. The mining operation is situated within an urban context, where industrial mining activities are subject to urban district noise limits. While it is acknowledged that mining activities are inherently industrial in nature, legislation does not provide alternative noise thresholds. No documented evidence was provided demonstrating that specific corrective actions were formally implemented within one month of the monitoring reports being issued in response to the recorded exceedances. A formal corrective action procedure should be developed and implemented for noise exceedances. Where monitoring results indicate non-compliance with applicable limits, documented corrective measures should be identified, implemented, and recorded.
Socio-Economic Management Plan							
Socio-Economic Management Measures							
Prior to Construction Phase							
SEM 7	In-migration management plan	Compilation of an in-migration management plan based on discussions through local engagement structures. These impacts will be difficult to manage and will require a collaborative effort between Newshelf and the Municipality.	ECO and / or SLP or Community Engagement Officer	PC	An in-migration management plan must still be compiled.	NC	An in-migration management plan has not yet been compiled. While engagement structures exist, a dedicated in-migration management plan, developed collaboratively with the Municipality, is required. It is recommended that this plan be compiled and formally adopted.
Construction, Operation and Decommissioning Phases							
SEM 41	Monitoring	Implement the Socio-economic Monitoring Programme to monitor the progress and effectiveness of proposed socio-economic mitigation measures and ensure stakeholder input is considered as part of the ongoing implementation process.	ECO	PC	Monitoring has not yet been carried out. Socio-economic monitoring is to occur at least every second month. The following aspects need to be implemented as soon as possible: The development of a community database, which will keep a record of all existing residents, their households and their dwelling type. Crimes must be reported to the mine so that a record can be kept of criminal activity within and around the mine. A specialist or community liaison officer must be appointed to carry out this monitoring.	NC	Monitoring has not yet been carried out. Socio-economic monitoring is to occur at least every second month. The following aspects need to be implemented as soon as possible: The development of a community database, which will keep a record of all existing residents, their households and their dwelling type. Crimes must be reported to the mine so that a record can be kept of criminal activity within and around the mine. A specialist or community liaison officer must be appointed to carry out this monitoring.
Traffic Management Plan							
Traffic Management Measures							
Construction, Operation and Decommissioning Phases							
TM 6	Access	The access routes must be clearly marked, and drivers must only travel on designated routes.	ECO	PC	No signage is present on the access roads. Traffic is however limited and drivers are trained in terms of the speed limits and access routes.	C	Vehicle access to both 7# and 10# was observed to occur via defined unpaved access routes extending from Hospital Road (Refer to Appendix 3, photos 1 and 55). According to Newshelf, drivers are trained and instructed to utilise designated routes only, and no evidence of uncontrolled off-route driving was observed during the inspection.
TM 7	Speed limit	Speed of construction vehicles and haul trucks travelling on unpaved roads must be limited to 40 km/h.	ECO	PC	Drivers are trained in terms of the speed limits. Signage should be erected on the access roads with the speed limits shown.	C	During the site inspection, vehicle movement on unpaved access roads was observed to be controlled and limited. Speed limit signage (40 km/h) is displayed at the controlled entrance to 10# (refer to Appendix 3, photo 3). Site management confirmed that drivers are trained and instructed to adhere to the prescribed speed limits. It is recommended that similar speed limit signage be displayed at the 7# access to ensure consistency across all access points. Records of driver training and speed-limit induction should be formally maintained and retained on file to provide auditable evidence of compliance.
TM 15	Road surfaces	The condition of the roads must be inspected to ensure that the road does not deteriorate or become unusable. A representative from the Municipality should be encouraged to participate in the	ECO	PC	The access roads to the shafts are deteriorating. The mine team is in communication with the municipality regarding the roads, electricity, sewage and water in the area, however municipal input with regards to these services is limited. Records of the communication with the	PC	Access roads to the mine are largely unpaved (refer to Appendix 3, photos 1 and 55). The public road leading towards 7# (Hewitt Street) was observed to be in a suitable condition at the time of inspection. The intersection at Hospital Road and Pfuhl Street was observed to be

Ref no.	Aspect	EMPr management measure	Responsible party	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
				Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
		engagement structures so that any issues related to road structure can be brought to the attention of the Municipality.			municipality must be kept. The mine team planned to compact and install a gravel cap on the access roads. The gravel cap within the fenced off area of 10# is complete.		deteriorating at the time of inspection. The mine team confirmed that engagement with the Municipality is ongoing regarding road condition; however, municipal response and intervention remain limited. It is recommended that formal records of all correspondence and engagement with the Municipality be retained on file to demonstrate proactive management of road-related matters.
Water Management Plan							
Water Management Measures							
Construction Phase							
WAM 7	Stormwater runoff management	Suitable flow diversion structures, such as diversion berms and/or collection canals, must be established around the border of the proposed operational areas diverted to flow diffusing infrastructure to release stormwater runoff into the environment preventing erosion.	ECO / Construction Manager	PC	Stormwater runoff management infrastructure and silt traps have not been constructed yet.	NC	No formal engineered stormwater diversion structures (e.g., diversion berms, collection canals, flow diffusers) were observed around the expanded operational footprint. An earth berm exists around the Gedex Pit; however, this does not constitute a suitable stormwater management system for the broader site, including stockpile areas and haul roads. It is recommended that engineered stormwater measures be installed.
WAM 8		Silt traps must be placed downstream of the operational areas.	ECO	PC		NC	No silt traps or sediment retention structures were observed downstream of operational areas. Given the expanded footprint and temporary ore stockpiling, sediment-laden runoff remains a potential risk during rainfall events. It is recommended that engineered stormwater measures be installed.
WAM 9	Construction materials management	When preparing concrete for the struts keep in mind that mixing of concrete take place on an impermeable surface.	ECO / Construction Manager	PC	Concrete is mixed on the bare ground, however concrete mixing is localised, and potentially contaminated soil is removed after completion. Concrete mixing must occur within a designated area on an impermeable surface.	C	No mixing of cement or concrete was observed on exposed soil surfaces. According to Newshelf, such mixing activities do not take place on exposed areas and are undertaken in controlled environments where applicable. No evidence of cement contamination was observed during the audit.
WAM 10	Uncontrolled discharges	No uncontrolled discharges to any surface water resources must be permitted. Any discharge points need to be approved by the relevant authority (DWS).	ECO / Construction Manager	PC	Stormwater runoff management infrastructure has not been constructed yet. Discharge noted at the water tanks for underground drilling was due to valve repair. Correct drainage to be constructed.	PC	No active uncontrolled discharge to surface water was observed at the time of inspection. However, stormwater controls are limited. The absence of adequate stormwater controls elevates risk. It is recommended that engineered stormwater measures be installed.
Construction and Operation Phases							
WAM 22	Dirty water management	All clean and dirty water areas need to be clearly separated in line with the requirements of regulation GN704 of the NWA.	ECO	PC	A sump has been installed at the ore bin to capture dirty water runoff. Other clean and dirty water management infrastructure has not been constructed. The wastewater treatment facility has been installed by the mine to treat grey and black water arising from the change rooms and ablution facilities. Water tanks for underground drilling have been installed and covered. Wastewater from drilling to be pumped and processed at 3# and pumped underground to 10#.	NC	The wastewater treatment facility has been installed by the mine to treat grey and black water arising from the change rooms and ablution facilities. No clear, engineered separation of clean and dirty water areas was observed across the expanded footprint. Stormwater diversion channels, separation berms, and defined dirty water containment systems have not been consistently implemented. The presence of temporary ore stockpiling and disturbed areas without structured runoff segregation increases the risk of blending clean and potentially contaminated runoff, contrary to the requirements of GN 704. It is recommended that engineered stormwater measures be installed.
WAM 23		Contained dirty water must be recycled and utilised within the mine water circuit where possible.		PC		NC	Underground water and other water streams are utilised within the mine water circuit where feasible. However, due to limited formal dirty water containment infrastructure, opportunities for systematic capture and recycling of dirty water are constrained. Historical temporary storage of treated sewage effluent in an unlined pond further indicates that water management systems are still being formalised. It is recommended that engineered stormwater measures be installed.
WAM 24		The designated dirty water area should be rehabilitated and minimised so as to minimise the potential loss of catchment surface runoff yield.		PC		NC	Dirty water areas have not been formally delineated, minimised or rehabilitated. Stormwater and dirty water segregation infrastructure has not yet been formally implemented. It is recommended that engineered stormwater measures be installed.
WAM 25	Stormwater runoff management	Stormwater runoff must be managed appropriately to ensure that the area is not flooded during heavy rainfall events.	ECO	PC	Stormwater runoff management infrastructure has not yet been constructed. There is an existing historical berm that runs around the east side of the pit. This will be upgraded by the mine in the future. The	NC	No evidence of flooding was observed during the audit period; however, formal engineered stormwater systems are limited. An earth berm is

Ref no.	Aspect	EMPr management measure	Responsible party	Previous audit period December 2021 - November 2023		Current audit period November 2023 - February 2026	
				Compliance	Comments / Recommendations	Compliance	Comments / Recommendations
					historical dumps/ berms to the south of 10# also divert runoff around the surface infrastructure area.		present around the Gedex Pit, but broader site-wide stormwater attenuation measures are not yet in place. It is recommended that engineered stormwater measures be installed.
WAM 26		Ensure that silt traps are maintained regularly.		PC		NC	No silt traps have been installed. Maintenance of such structures could not be demonstrated. It is recommended that engineered stormwater measures be installed.
Hazardous Substances / Hazardous Waste Management Plan							
Hazardous Substances / Hazardous Waste Management Measures							
Construction, Operation and Decommissioning Phases							
HCM 8	Disposal	The Mine must keep copies of all safe disposal certificates on-site.	ECO	PC	Digital copies are available at Modder East, however as per the condition these must be kept on site.	C	Hazardous hydrocarbon waste is collected by licensed contractors for disposal at licensed facilities. Safe disposal certificates were made available to the auditors for review.
General Waste Management Plan							
General Waste Management Measures							
Construction, Operation and Decommissioning Phases							
GWM 2	Waste drums / bins / skips	The mine will ensure that an adequate number of waste drums / bins / skips are available on site, upon a suitably hardened surface. Waste must be stored in a manner that it cannot be washed or blown into the environment.	ECO / Site manager	PC	Waste is stored in skips however the waste storage areas do not have firm, impermeable, chemical resistant floors and topsoil and subsoil must be protected from contamination or pollution.	PC	Domestic waste bins with fitted lids were observed at operational areas and offices, and these appeared adequate for routine waste generation. Steel skips are also provided for general waste, scrap metal and other waste streams. Waste is removed by appointed contractors on a regular basis. Not all skips and waste storage areas are located on hardened, impermeable surfaces. Certain skips were observed to be placed directly on soil. It is recommended that all waste skips and bins be placed on firm, impermeable and suitably hardened surfaces.
Hazardous Substances / Hazardous Waste Management Plan							
Hazardous Substances / Hazardous Waste Management Measures							
Construction, Operation and Decommissioning Phases							
HSHWM 11	Hazardous substances Storage and handling	Cement must be stored and cement batching must be undertaken on an impermeable surface.	ECO / Construction manager	PC	Concrete is mixed on the bare ground, usually within the specified footprint of the planned infrastructure area. Concrete mixing must occur within a designated area on an impermeable surface.	C	No mixing of cement or concrete was observed on exposed soil surfaces. According to Newshelf, such mixing activities do not take place on exposed areas and are undertaken in controlled environments where applicable. No evidence of cement contamination was observed during the audit.
HSHWM 16	Contaminated water	Surface water draining off potentially contaminated areas must be contained.	ECO / Site manager	PC	A sump has been installed at the ore bin to capture dirty water runoff. Other clean and dirty water management infrastructure has not been constructed.	NC	No formal engineered stormwater drainage system or dedicated dirty water management infrastructure had been implemented across the site. An earth berm has been constructed around the Gedex Pit to manage surface runoff and limit inflow. No significant erosion, structural failure or damage to this berm was observed during the site inspection. According to Newshelf, additional stormwater management measures, including the construction of sumps within the pit and installation of a culvert along the haul road, are planned as part of the ongoing development works. While the mine remains partly in its construction phase, mining activities have commenced, and the project footprint has expanded. As such, effective stormwater and dirty water management should be prioritised to prevent uncontrolled runoff and potential pollution of surrounding areas in accordance with Section 28 of the NEMA (duty of care) and Section 19 of the NWA (pollution prevention). Ongoing visual inspection and maintenance of the existing berm and drainage pathways should continue, particularly during and after heavy rainfall events. It is recommended that the planned stormwater control measures be implemented as a priority and that a formal stormwater inspection and maintenance schedule be established and documented. Stormwater and dirty water management infrastructure should be aligned with the current operational footprint and associated risks.

Table 12. New partial and non-compliances in terms of the EMPr noted during the current audit period

Ref no.	Aspect	EMPr management measure	Responsible party	Compliance	November 2023 - February 2026 Comments / Recommendations
Air Quality Management Plan					
Air quality management measures					
Construction Phase					
AQM 3	Impact on sensitive receptors	Any complaints relating to dust must be recorded and additional management measures must be investigated to address these if monitoring indicates exceedances in the standards.	ECO / Construction manager	PC	A complaints register is maintained at the entrance gate of 10#. According to Newshelf, no formal dust-related complaints were recorded in the site register during the audit period. Dust suppression measures were observed on site during the inspection, and ambient air quality and dustfall monitoring were undertaken during the audit period. However, surrounding residents submitted complaints via email during the audit period relating to general nuisance impacts, including dust. These complaints were not reflected in a consolidated complaints register. It is recommended that all dust-related complaints, irrespective of the platform through which they are received, be formally recorded in a consolidated complaints register. Additional management measures should be investigated and implemented.
AQM 5	Clearing	Vegetation clearing must be limited to areas required for the construction of surface infrastructure as per the approved layout.	ECO / Construction manager	PC	Since approval of the EA and the associated EMPr, the project footprint has expanded to accommodate the development of the trackless decline portal and associated surface infrastructure, resulting in an increase in the disturbed surface area from approximately 6 ha to approximately 36 ha. Vegetation clearing associated with these expanded activities has taken place. Applications for a new EA and an amended EMPr have been submitted to the DMPR; however, approval remains pending at the time of the audit.
AQM 6	Clearing	Vegetation surrounding the shaft areas must be left in place as windbreaks.	ECO / Construction manager	PC	During the site inspection, it was observed that vegetation within the originally approved footprint has been cleared beyond the extent reflected in the approved layout. Vegetation outside the expanded mine fence and beyond the currently disturbed areas was observed to be largely intact, with no extensive clearing evident beyond the operational boundary. Applications for amendment of the EMPr have been submitted to the competent authority; however, approval remains pending at the time of audit. Limited vegetation outside the established mine fence has been cleared.
AQM 7	Clearing	Earthmoving activities must be phased to reduce the source area (i.e. total exposed area at one time).	ECO / Construction manager	PC	The surface infrastructure footprint has expanded notably to accommodate the development of the trackless decline portal and associated infrastructure. Construction and operational mining activities are occurring concurrently within this expanded footprint. While not all areas within the expanded development footprint have been cleared simultaneously and some sequencing of works is evident, the cumulative extent of exposed disturbed areas remains evident due to overlapping construction and operational activities. In addition, ongoing operational traffic (haulage of materials on dirt roads), material handling and earthworks result in repeated disturbance of certain exposed surfaces. No evidence was observed of uncontrolled or unnecessary reworking of disturbed areas; however, the overall scale and concurrency of activities within the enlarged footprint result in greater exposed surface area and frequency of disturbance than would be expected under a strictly phased disturbance approach as contemplated in the approved EMPr. It is recommended that disturbance sequencing and progressive stabilisation of completed areas within the expanded footprint be strengthened where practicable, and that traffic management and stockpile handling practices be optimised to reduce repeated disturbance of exposed surfaces and associated dust and erosion risks.
AQM 8	Exposed areas	Frequency of disturbance of exposed areas must be limited.	ECO / Construction manager	PC	
AQM 10	Exposed areas	Windbreaks must be installed to the north and eastern sides upwind of the exposed areas. The noise barriers (height of 4 m) should serve as effective windbreaks, however should it be found that dust fallout exceeds standards, further mitigation, possibly additional windbreaks, must be implemented.	ECO / Construction manager	NC	No artificial windbreak structures were observed to have been installed. No noise barriers functioning as windbreaks were identified. Vegetation immediately surrounding the shaft infrastructure has largely been cleared; however, vegetation surrounding the perimeter fence of the expanded operational footprint has largely been left in place and provides some degree of natural buffering. Particulate matter and dust fallout monitoring are being undertaken, and dust suppression measures, including gravel surfacing and water bowser application (as of August 2024), are in place. Isolated exceedances of the applicable standards were noted at both 7# and 10#. It is recommended that the windbreak requirement be formally implemented.
AQM 11	Exposed areas	Exposed areas must be vegetated as soon as possible.	ECO / Construction manager	PC	No progressive re-vegetation of disturbed areas was observed. Construction and operational mining activities are ongoing within the expanded footprint, and large exposed areas remain without stabilisation through vegetation. Where areas are no longer required for active operations, progressive stabilisation and re-vegetation should be implemented.
AQM 12	Unpaved roads	Limit the on-site roads to the 3 ha shaft area and align the access roads with the approved project layout.	ECO / Construction manager	NC	The operational footprint has expanded to accommodate the development of the decline portal and associated infrastructure. Additional internal access and haul roads are present within the expanded surface infrastructure footprint. Therefore, unpaved roads extend beyond the originally approved 3 ha shaft area and do not align strictly with the original project layout.
Biodiversity Management Plan					
Biodiversity management measures					
Construction Phase					
BDM 1	Footprint	Vegetation clearing must be limited to designated areas as per the approved layout.	ECO / Construction manager	NC	Vegetation clearing has occurred within the expanded surface infrastructure footprint associated with the development of the decline portal and related infrastructure. This expanded footprint extends beyond the originally approved layout. Applications for amendment of the EA and EMPr have been submitted and are pending decision.
BDM 4	Initial rehabilitation	Rehabilitation must take place at the end of construction at initial disturbed areas. It must be ensured that no bare areas remain and that indigenous grassland species are reintroduced.	ECO	PC	Both construction and operational activities are ongoing within the expanded footprint. No evidence of progressive rehabilitation or reintroduction of indigenous grassland species was observed within previously disturbed areas. Exposed areas were noted within the operational footprint. It is recommended that progressive rehabilitation and stabilisation of completed construction areas should be implemented where operationally feasible.

Ref no.	Aspect	EMPr management measure	Responsible party	Compliance	November 2023 - February 2026 Comments / Recommendations
Blasting and Subsidence Management Plan					
Blasting and subsidence management measures					
Operation Phase					
BSM 3	Complaints	Complaints from surrounding residents regarding damage or nuisance must be investigated, informed by seismic monitoring. Should it be determined that blasting activities are resulting in damage, the blast design must be amended to prevent further nuisance and adequate legal measures will be invoked.	ECO		A complaints register is maintained at the entrance gate of 10#. No formal environmental complaints were recorded in the register during the audit period. Communication mechanisms are in place with surrounding communities via a dedicated WhatsApp communication group involving community representatives. A formal grievance mechanism is managed through Gold One. Complaints relating to blasting-related nuisance and alleged property damage were submitted by surrounding residents via email during the audit period. These complaints indicate that concerns were raised by surrounding receptors; however, not all complaints were formally captured / documented, and sufficient documented evidence was not available for audit review to confirm that all such complaints were formally investigated with reference to seismic monitoring results and closed out through a documented process. The blast monitoring results reviewed for the audit period do not indicate excessive blasting levels or exceedances of the applicable monitoring thresholds, and generally indicate that recorded ground vibration and air blast levels were within accepted limits. In addition, verbal communication from the mine indicated that illegal mining and associated blasting may be occurring in the area, which may influence surrounding community perceptions and complaints. It is recommended that all blasting-related complaints from surrounding residents, including those received verbally, by email, via WhatsApp, or through community representatives, be formally recorded in a consolidated complaints register. A documented complaint investigation and close-out procedure should also be compiled and implemented. It is further recommended that the surrounding communities be informed of the grievance mechanism and how to lodge a complaint.
Noise Management Plan					
Noise management measures					
Construction Phase					
NM 1	Noise barrier	Erect a noise barrier around the shaft areas using a non-polluting noise attenuating material. The barrier should be 1 m above the bottom of the storage bin chute which is situated approximately 3 m above the ground. The barrier should therefore be at least 4 m in height.	ECO / Construction manager	NC	No dedicated freestanding noise barriers have been constructed around the shaft areas as prescribed by the condition. While structural enclosure of certain infrastructure provides some degree of attenuation, noise monitoring exceedances have been recorded during the reporting period. Given the proximity of the operation to residential receptors, additional engineered noise attenuation measures should be formally assessed and implemented. Where site constraints limit full perimeter enclosure (e.g. due to the open pit configuration), equivalent engineered noise mitigation measures should be proposed and documented to demonstrate alignment with the intent of the condition.
NM 13	Complaints	A grievance mechanism should be introduced whereby noise complaints can be received and responded to. Any complaints relating to noise must be recorded and the ECO must respond to complaints appropriately in a timeous manner. If necessary, further monitoring must be conducted and corrective measures investigated and implemented.	ECO	PC	A complaints register is maintained at the entrance gate of 10#. No formal environmental complaints were recorded in the register during the audit period. Communication mechanisms are in place with surrounding communities via a dedicated WhatsApp communication group involving community representatives. A formal grievance mechanism is managed through Gold One. However, noise and nuisance-related complaints were received from surrounding residents via email during the audit period; however, these were not reflected in the formal site complaints register, and sufficient documented evidence was not available to confirm timeous response, close-out, or follow-up action where required. It is recommended that all noise-related complaints be formally recorded in a consolidated complaints register. The grievance mechanism and complaint-lodging procedure should also be clearly communicated to surrounding communities, and a documented complaint response and close-out process should be implemented.
Socio-Economic Management Plan					
Socio-Economic management measures					
Prior to Construction Phases					
SEM 2	Stakeholder engagement plan	A stakeholder engagement plan (including a grievance mechanism), to provide a defined process for two-way communication between the community and the Mine must be compiled. The grievance mechanism must prescribe methods for community members to raise complaints (anonymously if they so choose). Complaints must be responded to and addressed effectively. Response methods and timeframes must be specified in the grievance mechanism. IAPs must be notified of the stakeholder engagement plan and grievance mechanism.	ECO and / or SLP or Community Engagement Officer	PC	The Social and Labour Plan (SLP) was reviewed during the audit and includes stakeholder engagement commitments and community interface requirements, which are implemented through the mine's engagement processes. A complaints register is maintained at the entrance gate of 10#. No formal environmental complaints were recorded in the register during the audit period. Communication mechanisms are in place with surrounding communities via a dedicated WhatsApp communication group involving community representatives. A formal grievance mechanism is managed through Gold One. However, complaints and concerns were submitted by surrounding residents via email during the audit period, including concerns relating to noise, dust, and a general decline in living conditions. Although the email correspondence indicates that the mine has responded to these complaints, documented evidence demonstrating that the complaints were resolved / addressed effectively was not provided for audit review. It is recommended that documented evidence of how complaints and issues are received, addressed, resolved, and closed out be maintained, compiled, and made available for audit review. All complaints received via any platform should be consolidated into a single register and tracked to closure.
Construction, Operation and Decommissioning Phases					
SEM 26	Complaints	Any complaints received regarding the mine must be addressed adequately through the grievance mechanism and corrective measures implemented where warranted.	ECO and / or SLP or Community	PC	A complaints register is maintained at the entrance gate of 10#. According to Newshelf, no formal environmental complaints were recorded in the register during the audit period. However, complaints and concerns were submitted by surrounding residents via email during the audit period, including concerns relating to blasting, noise, dust, and nuisance impacts. Although the mine appears to be responding to these complaints, they were not reflected in a formal

Ref no.	Aspect	EMPr management measure	Responsible party	Compliance	November 2023 - February 2026 Comments / Recommendations
			Engagement Officer		complaints register, and documented evidence showing how the complaints were addressed, including any corrective measures and close-out, was not provided for audit review. It is recommended that documented evidence of how complaints and issues are received, investigated, addressed, resolved, and closed out be maintained, compiled, and made available for audit review. All complaints received via any platform should be consolidated into a single register and tracked to closure.
SEM 27	SMCC	Frequent communication between the mine and the management of the SMCC will assist in the activities of the mine lessening the impact on the restaurant. For example, the mine could seek to adjust timing of their activities where possible to reduce particularly noisy activities during golf course functions or peak usage times.	ECO and / or SLP or Community Engagement Officer	PC	No documentary evidence (e.g. minutes of meetings, correspondence, or engagement records) was provided to demonstrate structured communication between the mine and State Mines Country Club (SMCC) during the audit review period. According to Newshelf, no formal engagement with SMCC took place during this period. Blast monitoring is being undertaken in accordance with the relevant management plans. The absence of documented engagement with SMCC does not fully satisfy the intent of the condition, which requires proactive and ongoing communication. It is recommended that formal communication channels be established with SMCC management, including periodic engagement (e.g. quarterly meetings or written correspondence), and that records of such engagements be retained on file.
Soil Management Plan					
Soil management measures					
Construction and Operation Phase					
SM 14	Contamination	Spillages of hydrocarbons and/or cement should be cleaned up immediately and the contaminated soil should preferably be treated *in situ*, for example using bioremediation. The acceptability of this option must be verified by an appropriate soils expert on a case by case basis, before it is implemented. If remediation is not possible, the contaminated soil should be excavated and removed from site, handled accordingly and discarded as potentially hazardous waste.	ECO / Construction manager	PC	Minor and localised hydrocarbon spill residues were observed within operational areas during the site inspection, indicating that immediate containment is not consistently implemented. According to Newshelf, minor spill incidents are addressed through immediate clean-up using absorbent materials available on site. Spill kits were observed to be present within operational areas to facilitate rapid response. No evidence was provided during the audit of formal in situ remediation (e.g. bioremediation) having been undertaken during the audit period, nor of verification by a soils specialist where such treatment was implemented. It is understood that spill incidents during the period were limited in scale and managed through removal of contaminated material; however, formal documentation confirming the handling, treatment or disposal pathway of contaminated soil was not available for review. It is recommended that a formal spill and contaminated soil register be maintained, recording the date and location of each spill, estimated volume, clean-up measures undertaken, whether in situ treatment was considered or implemented (and specialist verification where applicable), and the disposal details of any excavated contaminated soil.
SM 17	Erosion	Stabilise exposed (bare) areas with vegetation and/or erosion control blankets. Flow-inhibiting grasses such as Vetiver or biodegradable Jute mesh erosion control blanket should be established on open areas and along the lower ends of the site, in order to retard overland water flow and erosion. The effect of the Jute mesh can be enhanced by putting it over a loose blanket of thatching grass or reeds. Alternatively, strips of instant turf can be planted a few meters apart during spring or late summer, with tuft runner grasses in between.	ECO / Construction manager	PC	According to Newshelf, no backfilling activities were undertaken during the audit review period. No backfilling was observed by the auditors during the site inspection. No significant erosion scars were observed during the site inspection; however, formal engineered stormwater control infrastructure has not yet been implemented across the expanded footprint. While an earth berm has been constructed around the Gedex Pit, broader stormwater attenuation and structured erosion control measures remain limited. Soil stabilisation interventions such as vegetative cover, erosion control blankets, turfing or similar measures have not been implemented in a systematic manner, and exposed areas and stockpiles remain vulnerable to runoff, particularly during high rainfall events. The temporary stockpiling of ore material further increases the potential for sediment-laden runoff if not adequately managed.
SM 18	Erosion	Erosion control of all banks, including the existing eroded drainage channels, must take place so as to reduce erosion and sedimentation. Eroding embankments need to be sloped to a gradient of not more than 1:3 and appropriately re-vegetated. Cleared bush can be used for backfill in the existing eroded drainage channels.	ECO / Construction manager	PC	The implementation of structured stormwater and erosion control measures, together with documented monitoring and maintenance procedures, is recommended to reduce the risk of soil loss and sedimentation.
Visual Management Plan					
Visual management measures					
Construction Phase					
VM 1	Site disturbance	The extent of the areas to be disturbed must be limited in area to only that which is essential as per the approved layout	ECO / Construction manager	NC	The project footprint has expanded beyond the original 6 ha authorised area to approximately 36 ha. Disturbance is largely confined to the expanded infrastructure areas associated with the shafts, decline portal and related surface infrastructure; however, the overall disturbed footprint exceeds that of the original approved layout. While disturbance is associated with operational requirements, the extent of exposed and disturbed areas increases visual impact.
VM 5	Visual intrusion	Plant indigenous fast growing trees along the mine boundary between sensitive receptors and shaft areas.	ECO / Construction manager	NC	Vegetation along the mine boundary has largely been left intact. Indigenous screening vegetation has not been planted along the mine boundary between sensitive receptors and shaft areas as prescribed. Given the proximity of certain operations (including ore hauling activities) to residential receptors, the absence of vegetative screening increases visual exposure. It is recommended that a structured boundary screening plan be developed and implemented, taking into account safety, operational access and pending authorisation amendments.

Ref no.	Aspect	EMPr management measure	Responsible party	Compliance	November 2023 - February 2026 Comments / Recommendations
Water Management Plan					
Water management measures					
Prior to Construction Phase					
WAM 1	WUL	Ensure that a WUL has been awarded prior to the commencement of construction for all applicable water uses.	ECO	PC	Newshelf holds an approved WUL (ref. no.: 08/C21D/IC/7032), issued by the DWS in July 2019, authorising various water uses associated with the Cons Modder Mine operations. This licence was in place prior to the commencement of construction and operational activities at the historical shafts in January 2023. A second separate WUL (Ref. no. 10/C21D/CFGIJ/15236), issued in September 2024, authorised the once-off dewatering of the historic Gedex pit. However, activities associated with the development of the trackless decline portal introduce additional Section 21 water uses that are not authorised under either of the existing WULs; therefore, water use activities have commenced prior to the issuance of the required WUL. A WUL application is currently being undertaken to consolidate all water uses; this will be submitted in March / April 2026.
WAM 2	WUL	No development of activities should take place within 500 m of watercourses prior to being authorised.	ECO	PC	Newshelf has authorisation for some activities being undertaken (refer to the above comment). However, the construction and operation of the project site and pit roads at 10# occurs within 500 m of a wetland. Dust suppression on 10# site and access roads also occur within 500 m of a wetland. These activities constitute development within 500 m of a watercourse and involve direct wetland and stream crossings. A WUL application is currently being undertaken to consolidate all water uses; this will be submitted in March / April 2026.
Construction Phase					
WAM 5	No-go areas	Clearly demarcate (on the ground) the construction footprint area and strictly limit all construction activities to within this area. Contractor laydown areas, resources, vehicle re-fuelling areas and material storage facilities to remain outside of the delineated freshwater environment.	ECO / Construction Manager	PC	The broader operational footprint is evident, and activities are generally confined to the established infrastructure areas; however, no formal on-the-ground demarcation (e.g., fencing, pegs, signage) clearly defining the construction footprint was observed. The mining areas are fenced off.
Construction and Operation Phases					
WAM 20	WUL	Ensure that the conditions of any awarded WUL are strictly adhered to.	ECO	PC	Newshelf holds an approved WUL (ref. no.: 08/C21D/IC/7032), issued by the DWS in July 2019, authorising various water uses associated with the Cons Modder Mine operations. This licence was in place prior to the commencement of construction and operational activities at the historical shafts in January 2023. A second separate WUL (Ref. no. 10/C21D/CFGIJ/15236), issued in September 2024, authorised the once-off dewatering of the historic Gedex pit. However, activities associated with the development of the trackless decline portal introduce additional Section 21 water uses that are not authorised under either of the existing WULs; therefore, water use activities have commenced prior to the issuance of the required WUL. A WUL application is currently being undertaken to consolidate all water uses; this will be submitted in March / April 2026.
WAM 21	Best practise	Ensure that all Best Management Guidelines as published by the DWS are adhered to.	ECO	PC	Certain water management practices are implemented, including groundwater monitoring and basic surface runoff control (e.g., berm around the Gedex Pit). However, stormwater controls and sediment runoff controls consistent with DWS Best Practice Guidelines were not fully implemented across the expanded footprint.
WAM 28	Stormwater runoff management	Implement surface water management measures around the old opencast pit.	ECO	PC	An earth berm exists around the Gedex Pit and works associated with the decline portal development are ongoing. However, comprehensive engineered surface water management measures (e.g., diversion channels, sediment control systems) are not yet fully implemented.
Hydrocarbon Management Plan					
Hydrocarbon management measures					
Construction, Operation and Decommissioning Phases					
HCM 1	Drip trays and storage	All generators will be placed on drip trays to catch spills and leaks, while all maintenance work on equipment, vehicles, machinery, etc. will be done over a plastic tarpaulin or steel drip trays situated within dirty water catchment areas.	ECO / Site manager	PC	Drip trays were not consistently observed beneath stationary machinery, pumps and parked vehicles during the site inspection. In several instances, equipment and oil storage containers were positioned directly on soil or on wooden pallets without secondary containment. Although spill kits are available on site and minor spillages were addressed, the absence of consistent drip tray use increases the risk of soil contamination. It is recommended that drip trays be installed beneath all stationary hydrocarbon-containing equipment and that a formal inspection schedule be implemented to ensure regular emptying and maintenance.
HCM 2	Drip trays and storage	Any pumps, machinery or other equipment that require oil, diesel, etc., that are to remain in one position for longer than two days will be placed on drip trays which are to be emptied regularly. Any effluent from the drip trays and any spilled oils and fuels will be collected and stored in 210 litre drums before being collected and disposed of by a licensed waste removal company.	ECO / Site manager	PC	
HCM 4	Drip trays and storage	Store fuel, oils and other lubricants in a bunded storeroom with a capacity to contain 110 % of the total volume thereof.	ECO / Site manager	PC	The hydrocarbon storage areas at 7# and 10# appear to be adequately bunded (Refer to Appendix 3, photos 35, 36, 38, 39, 41, 42, 46, 47, 63, 65, 66 and 81). However, some hydrocarbons were directly stored onto soil. Some oil drums were placed directly on the soil surface, while others were positioned on wooden pallets resting on soil. IBCs were observed to be elevated on supporting structures; however, some were noted to be leaking, presenting a potential contamination risk. Refer to Appendix 3, photos 21, 25, 27, 28, 32, 43, 64, and 67.

Ref no.	Aspect	EMPr management measure	Responsible party	Compliance	November 2023 - February 2026 Comments / Recommendations
					It is recommended that all hydrocarbon storage and handling areas be standardised to include firm, impermeable, chemical-resistant surfaces with appropriate bunding or secondary containment.
HCM 5	Vehicle and equipment maintenance	Ensure that all mechanical equipment and vehicles used are kept in good working order to prevent any leakage of oil, petrol, diesel, hydraulic and other associated fluids.	ECO / Site manager	PC	Vehicles and equipment appear operational; however, minor hydrocarbon spillages were observed on site. Drip trays were not consistently used beneath parked vehicles or stationary equipment. Breakdowns and maintenance must be managed to prevent ingress of hydrocarbons into soil, and temporary drip containment must be used at all times.
HCM 6	Vehicle and equipment maintenance	Vehicles used during the construction phase must be parked in a designated area and drip trays or tarpaulin must be used to prevent any hydrocarbon spills.	ECO / Site manager	PC	
HCM 7	Vehicle and equipment maintenance	In the event of a breakdown, maintenance of vehicles must take place with care and the collection of spillage should be practiced to prevent the ingress of hydrocarbons into the topsoil.	ECO / Site manager	PC	
HCM 12	Spills	Should an oil spill occur as a result of leaking equipment, machinery or vehicles, it is to be cleaned utilising oil remediation solvents or commercial hydrocarbon spill kits of which the Mine is to maintain a supply on site.	ECO	PC	Spill kits and sorb materials were observed at strategic locations on site. However, minor spillages were noted on soil surfaces, and no formal spill register was available for review. Drip trays were not used on-site at the time of the site inspection. It is recommended that a spill incident register be implemented and that all spill events be recorded, including volume, location, remedial action and disposal route. Drip trays should be used beneath all stationary equipment and vehicles.
HCM 13	Spills	A 210 litre drum for the collection of spilled oils and fuels, together with a drip tray to catch spills and leaks before they can contaminate soil must be available on-site at all times.	ECO	PC	
Hazardous Substances / Hazardous Waste Management Plan					
Hazardous substances / hazardous waste management measures					
Construction, Operation and Decommissioning Phases					
HSHWM 4	Ore handling and spills	The loading areas must be impermeable.	ECO	PC	Certain loading and storage areas are constructed on concrete surfaces; however, ore loading and material handling also occur on exposed areas (Refer to Appendix 2, photos 13 and 73). It is recommended that loading areas be appropriately surfaced and lined to prevent seepage and contamination.
HSHWM 9	Hazardous substances Storage and handling	A walled concrete platform, dedicated store with adequate flooring or bermed area must be used to accommodate hazardous substances as appropriate according to their specific MSDS, in well-ventilated areas.	ECO	PC	Dedicated hydrocarbon storage areas with concrete bunding were observed at certain locations. However, oil drums and containers were also observed placed directly on soil or on wooden pallets without secondary containment in some areas. It is recommended that all hazardous substances be stored on impermeable, bunded surfaces with adequate containment.
HSHWM 13	Spills	If any spills occur, they should be immediately cleaned up	ECO	PC	Spill kits were observed on site. Minor spillages were noted and generally managed; however, oil drips beneath stationary machinery were observed in certain areas, indicating that immediate containment is not consistently implemented.
HSHWM 18	Waste storage capacity	The bund walls for all storage facilities containing any industrial or related hazardous substances / wastes will have sufficient storage capacity of 110 % from the combined storage capacity.	ECO / Site manager	PC	The hydrocarbon storage areas at 7# and 10# appear to be adequately bunded (Refer to Appendix 3, photos 41, 42, 47, and 63). However, some hydrocarbons were directly stored onto soil. Some oil drums were placed directly on the soil surface, while others were positioned on wooden pallets resting on soil. IBCs were observed to be elevated on supporting structures; however, some were noted to be leaking, presenting a potential contamination risk. Refer to Appendix 3, photos 21, 25, 27, 28, 32, 43, 64, and 67. It is recommended that all hydrocarbon storage and handling areas be standardised to include firm, impermeable, chemical-resistant surfaces with appropriate bunding or secondary containment.

6 MONITORING DATA

The following monitoring has been conducted during the audit review period.

6.1 ECO monitoring

ECO monitoring is generally undertaken on a monthly basis by the mine's appointed ECO. The latest ECO report for the audit review period is included in Appendix 4.

6.2 Air quality monitoring

Monthly ambient air quality monitoring at the Cons Modder Mine is undertaken by Rayten Engineering Solutions (Pty) Ltd ("Rayten") at fixed monitoring stations located in the vicinity of the operation (Figure 10). The monitoring programme includes continuous monitoring of particulate matter ($PM_{2.5}$ and PM_{10}) and dustfall assessment using eight buckets. Refer to Appendix 5 for the latest air quality monitoring report relevant to the audit review period.

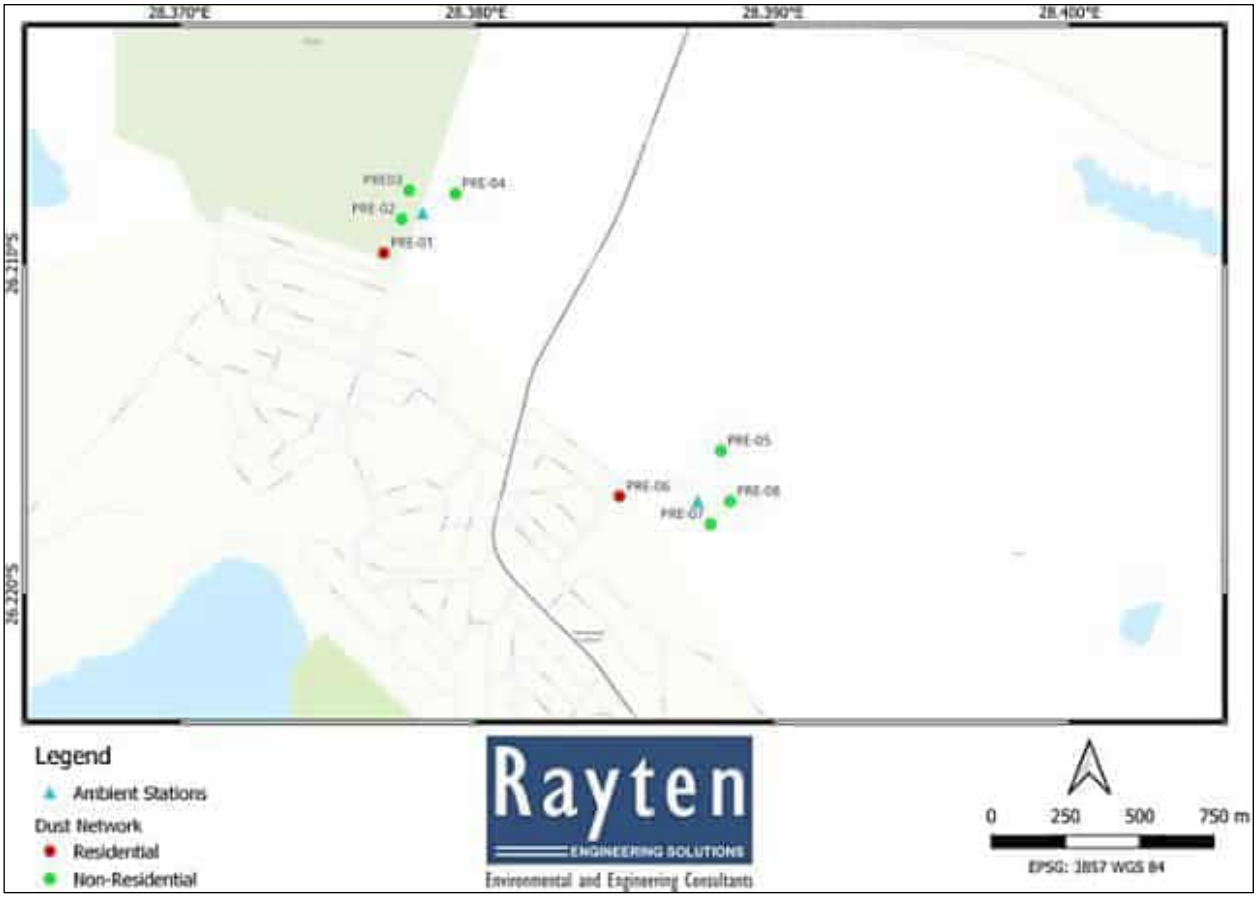

Figure 10. Ambient and dustfall monitoring network (Rayten, 2025)

6.2.1 Particulate matter

Particulate matter (PM) concentrations are assessed against the National Ambient Air Quality Standards (NAAQS) promulgated in terms of the National Environmental Management: Air Quality Act (NEM:AQA; No. 39 of 2004), specifically GN 1210 of 2009 (as amended). PM concentrations were acquired from two air quality monitoring stations (AQMS), namely Site-001 (at 7#) and Site-002 (at 10#). PM_{10} results were compared against the 24-hour average limit of 75 µg/m^3 and the annual average limit of 40 µg/m^3. $PM_{2.5}$ concentrations were assessed against the daily average limit of 40 µg/m^3 and the annual average limit of 20 µg/m^3. The daily standards regulate short-term

exposure and allow a maximum of four exceedances per calendar year. Exceedances beyond this permitted frequency constitute non-compliance with the NAAQS.

The available PM monitoring results for the period November 2023 to December 2025 are summarised below. At the time of undertaking this audit, the January 2026 monitoring report had not yet been issued and was therefore not available for review. Data availability varied throughout the reporting period due to:

- Power and data acquisition interruptions
- PM instrument malfunctions at both sites (notably November 2024 to January 2025)
- Faulty sensor at Site-002 (November 2025)
- Data exclusion during at both sites from May to July 2024 due to quality control filtering
- Data loss at both sites in December 2025 (sensor failure)

Several months (particularly May to August 2024 and February to July 2025) required the removal of daily averages with less than 65 to 75 % data recovery. Therefore, certain monthly results should be interpreted with caution, as data gaps may influence exceedance frequency and trend interpretation.

Exceedance summary:

- 2023
    - November 2023: No exceedances recorded.
    - December 2023: One $PM_{2.5}$ exceedance at Site-001.
- 2024
    - January to April 2024 – Isolated exceedances at Site-001.
    - Increasing exceedance frequency at Site-002 from February onwards.
    - May to July 2024:
        - Significant and widespread exceedances, particularly at Site-002.
        - May 2024 marked the onset of annual non-compliance:
            - Site-002 recorded exceedances on nearly all valid monitoring days for both $PM_{2.5}$ and PM_{10}.
            - Site-001 exceeded the annual allowable exceedance frequency for $PM_{2.5}$.
        - Calm wind conditions and no rainfall likely contributed to pollutant accumulation.
    - August to September 2024:
        - Continued exceedances at Site-002.
        - Site-001 recorded fewer exceedances, but the cumulative annual non-compliance status remained.
    - October 2024:
        - Limited valid data.
        - One PM_{10} exceedance at Site-001.
        - Site-002 data unavailable.
    - November to December 2024:
        - No valid data due to instrument malfunction.

Overall, 2024 reflects a progressive decrease in compliance status, particularly at Site-002, driven largely by winter months (May to August).

- 2025
    - January 2025:
        - No valid data (instrument issues).
    - February to April 2025:
        - Exceedances resumed at both sites.
        - Increasing frequency of daily exceedances.
        - Construction and land-clearing activities identified as contributors.
    - May to July 2025:
        - Sustained high exceedance frequency at both sites.
        - May 2025 recorded the highest exceedance frequency of the entire monitoring period
            - Site-001: 23 $PM_{2.5}$ and 19 PM_{10} exceedances
            - Site-002: 29 $PM_{2.5}$ and 29 PM_{10} exceedances
        - June and July remained elevated despite some rainfall.
        - Calm conditions and winter inversions likely exacerbated pollutant accumulation.
    - August to September 2025:
        - Elevated exceedances persisted but at lower frequency relative to May to July.
        - Ongoing road construction and earthworks identified as primary local source.
        - Dust suppression measures implemented (increased watering, compaction, housekeeping).
    - November 2025:
        - Limited valid data at Site-001.
        - Two $PM_{2.5}$ and one PM_{10} exceedances recorded.
        - Site-002 data invalid due to faulty sensor.
    - December 2025:
        - No data (sensor failure).

Overall, 2025 demonstrates sustained non-compliance with the allowable annual exceedance frequency at both sites, particularly for $PM_{2.5}$.

Observed trends

- Seasonality:
    - Elevated PM concentrations during winter months (May to August) in both 2024 and 2025.
    - Likely driven by:
        - Increased domestic heating activities (fireplaces, heating of homes etc.)
        - Temperature inversions
        - Reduced atmospheric dispersion
        - Low rainfall and calm wind conditions.
- Meteorological influence:
    - Several high-exceedance months coincided with:
        - Minimal rainfall
        - High frequency of calm wind conditions likely contributed to pollutant stagnation.

- Construction-related influence (2025):
    - Land clearing and road construction adjacent to monitoring sites identified as significant contributors.
    - Exceedance frequency increased notably during active construction periods.
    - Mitigation measures were introduced during late 2025.

Elevated PM concentrations are likely attributable to a combination of local and regional sources. These include vehicle movement on nearby roads resulting in the re-entrainment of surface dust, exposed and cleared land surfaces, ongoing mining and earthworks activities, and surrounding industrial operations. During winter months, domestic fuel combustion (wood fires) is also considered a contributing regional source.

Construction-related dust associated with roadworks and land clearing in 2025 was identified as a significant localised contributor during that period. Across the full monitoring duration, vehicle-induced re-suspension of dust appeared to be a consistent and dominant source at both monitoring locations, particularly under dry and low-wind conditions.

Overall compliance status varied over the monitoring period (Table 13). During late 2023, ambient $PM_{2.5}$ and PM_{10} concentrations were generally compliant with the NAAQS, with only a single exceedance recorded (December 2023, $PM_{2.5}$ at Site-001). In 2024, a progressive increase in exceedance frequency was observed, particularly from mid-year onwards. Non-compliance with the allowable annual exceedance frequency (four exceedances per calendar year per pollutant) became evident from mid-2024. In 2025, exceedance frequencies increased and remained elevated for extended periods at both monitoring sites. Most exceedances occurred between February and September 2025, with peak exceedance frequency recorded during May to July 2025.

Implementation of dust suppression measures, including water spraying on haul roads, stockpile management, and good housekeeping practices, is recommended.

As reflected in Table 13, non-compliance with the 24-hour NAAQS has been noted during the monitoring period, particularly in respect of $PM_{2.5}$ concentrations. The frequency of recorded daily exceedances exceeded the allowable four exceedances per calendar year in multiple instances. Site-002 (10#) recorded more exceedances than Site-001 (7#) over the monitoring period, for both $PM_{2.5}$ and PM_{10}.

Table 13. Consolidated summary of daily PM exceedances per monitoring site and per month for the period November 2023 to December 2025

Year	Month	Site 1		Site 2		Total monthly exceedances
		$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	
2023	*Nov-23*	0	0	0	0	0
	Dec-23	1	0	0	0	1
	Total NAAQS exceedances per site and parameter	***1***	***0***	***0***	***0***	1
2024	*Jan-24*	1	0	0*	0*	1
	Feb-24	0	0	1	1	2
	Mar-24	0	0	2	2	4
	Apr-24	1	1	5	3	10
	May-24	4	1	26	24	55
	Jun-24	1	1	*No data*	*No data*	2

Year	Month	Site 1		Site 2		Total monthly exceedances
		$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	
	Jul-24	5	4	*No data*	*No data*	9
	Aug-24	0	0	12	12	24
	Sept-24	0	0	1	1	2
	Oct-24	0	1	*No data*	*No data*	1
	Nov-24	*No data*	*No data*	*No data*	*No data*	*No data*
	Dec-24	*No data*	*No data*	*No data*	*No data*	*No data*
	Total NAAQS exceedances per site and parameter	***12***	***8***	***47***	***43***	***110***
2025	*Jan-25*	*No data*	*No data*	*No data*	*No data*	*No data*
	Feb-25	6	1	5	1	13
	Mar-25	8	4	6	2	20
	Apr-25	9	4	18	14	45
	May-25	23	19	29	29	100
	Jun-25	14	9	24	21	68
	Jul-25	19	11	23	17	70
	Aug-25	14	6	24	13	57
	Sept-25	7	3	7	4	21
	Oct-25	*No data*	*No data*	*No data*	*No data*	*No data*
	Nov-25	2	1	*No data*	*No data*	3
	Dec-25	*No data*	*No data*	*No data*	*No data*	*No data*
	Total NAAQS exceedances per site and parameter	***102***	***58***	***136***	***101***	***397***

** January Site-002 exceedance excluded from 24-hour averaging (insufficient data)*

Figure 11 and Figure 12 present the monthly average PM concentrations recorded at Site-001 and Site-002 for the period November 2023 to December 2025. These figures illustrate the temporal trends in PM concentrations, highlighting seasonal variability and elevated concentrations during winter months and periods of surface disturbance.

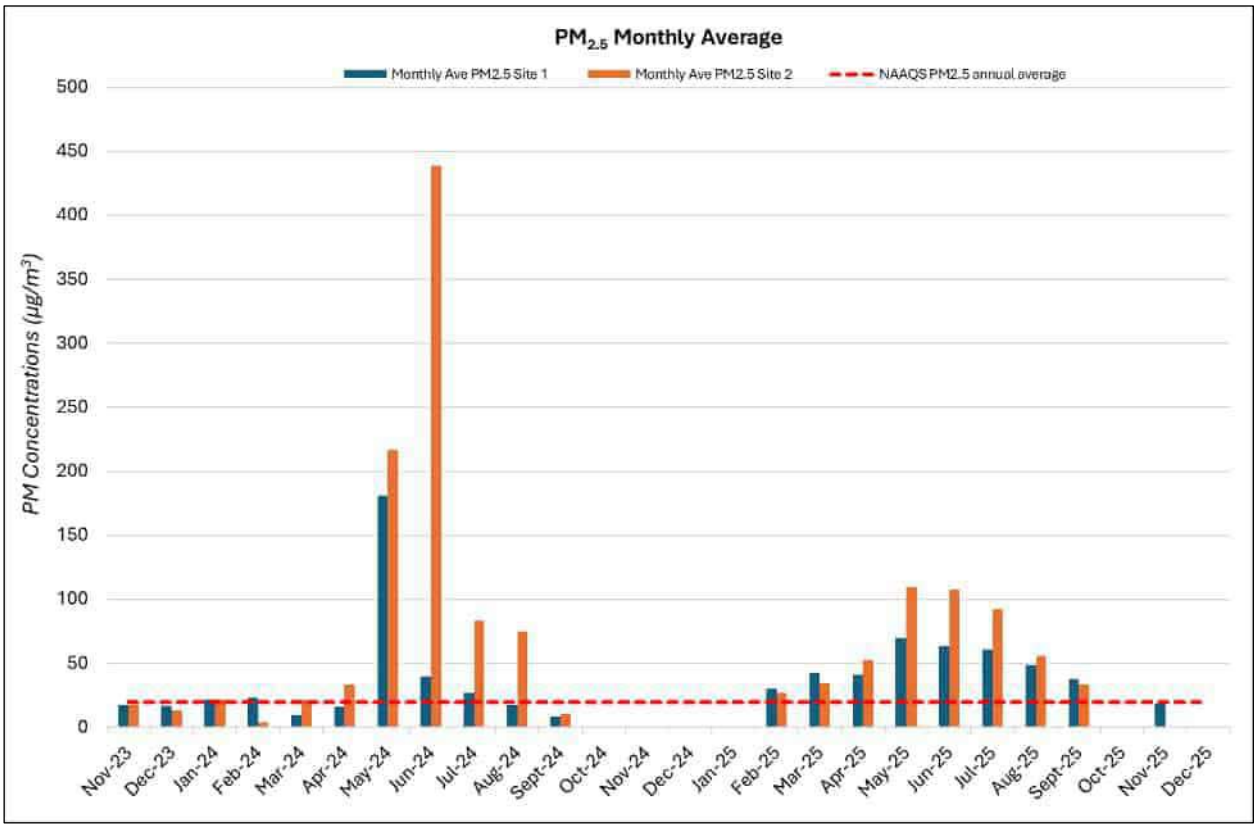

Figure 11. Average monthly $PM_{2.5}$ trends at Site-001 and Site-002

The average annual NAAQS for $PM_{2.5}$ (20 µg/m^3) is shown in Figure 11 for contextual comparison. Monthly averages are not used for compliance assessment but provide an indication of periods contributing to elevated annual concentrations.

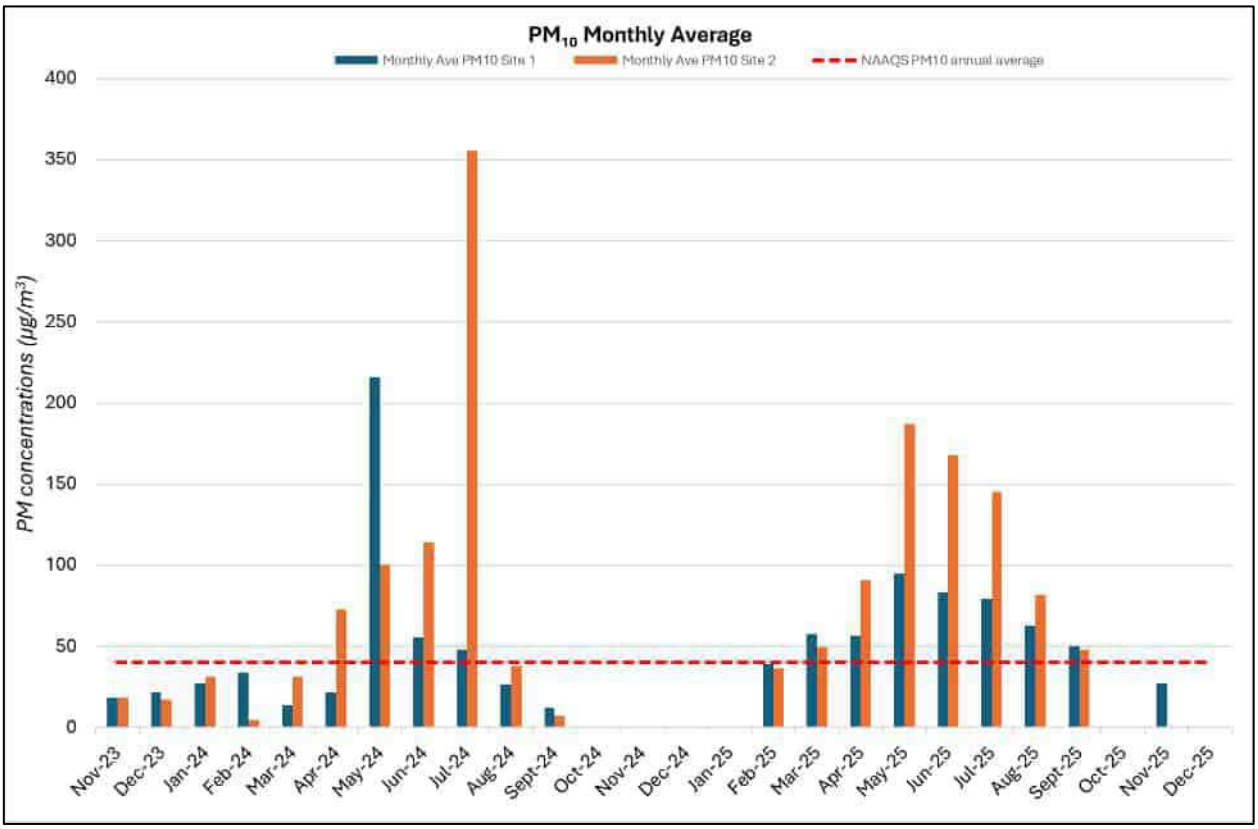

Figure 12. Average monthly PM_{10} trends at Site-001 and Site-002

The average annual NAAQS for PM_{10} (40 µg/m^3) is shown in Figure 12 for contextual comparison. Monthly averages are not used for compliance assessment but provide an indication of periods contributing to elevated annual concentrations.

6.2.2 Dustfall

Dustfall results were assessed against the National Dust Control Regulations (NDCR; GNR 827 of 2013), which prescribe residential (< 600 mg/m^2/day) and non-residential (< 1 200 mg/m^2/day) dustfall limits. The dustfall monitoring network (PRE-001 to PRE-008) originally comprised five monitoring locations; three additional locations were added in November 2024. The NDCR allow for two exceedances of the applicable dustfall limit within a 12-month period for both residential areas and non-residential areas, provided that these exceedances do not occur in sequential months.

Dustfall monitoring results for the period November 2023 to December 2025 indicate that most recorded values across all monitoring stations remained within the applicable limits of the NDCR.

Monitoring stations PRE-001 and PRE-006 are subject to the residential dustfall limit (< 600 mg/m^2/day). PRE-006 recorded two exceedances during the monitoring period, namely in September 2024 (1 052.00 mg/m^2/day) and May 2025 (3 328.35 mg/m^2/day). The September 2024 exceedance at PRE-006 coincided with construction activities occurring in proximity to the dust bucket during the monitoring period. The May 2025 exceedance similarly occurred during a period where excavation activities were being undertaken adjacent to the monitoring location. These localised disturbance activities are considered likely contributors to the elevated dust deposition rates recorded during those months.

The remaining monitoring stations (PRE-002 to PRE-005, PRE-007 and PRE-008) are subject to the non-residential limit (< 1 200 mg/m^2/day) and were below the applicable threshold, apart from exceedances recorded at PRE-005 in September 2024 (3 956.73 mg/m^2/day) and May 2025 (1 367.16 mg/m^2/day). The September 2024 exceedance at PRE-005 coincided with the presence of a soil stockpile located adjacent to the monitoring station, which likely contributed to elevated dust concentrations under dry conditions. The May 2025 exceedance occurred during excavation activities along the side of the monitoring location, which is considered a probable source of increased deposition.

Elevated dustfall rates were generally observed during late winter and spring months (August to September) and during periods of increased surface disturbance in 2025. However, exceedances were limited to isolated events associated with identifiable localised activities and were not sustained across consecutive monitoring periods.

While isolated high-magnitude dustfall events were recorded, no more than two exceedances occurred within any rolling 12-month period, and these were not consecutive. The results do not indicate persistent non-compliance with the NDCR dustfall frequency requirements.

Refer to Table 14 and Figure 13.

Table 14. Dustfall results from November 2023 to December 2025 (mg/m²/day)

Date	Dustfall monitoring site							
	PRE-001 (Residential) *SE corner of State Mine Golf Course*	**PRE-002 (Non-residential)** *Golf Course Opposite Main Gate 7#*	**PRE-003 (Non-residential)** *SW along the golf course's fence*	**PRE-004 (Non-residential)** *Behind 7#*	**PRE-005 (Non-residential)** *Behind 10#*	**PRE-006 (Residential)** *Jonh's house*	**PRE-007 (Non-residential)** *Right-side of 10# entrance*	**PRE-008 (Non-residential)** *Behind 10# offices*
Nov-23	267.70	274.70	369.57	*Site commissioned in November 2024*	324.81	258.34	*Site commissioned in November 2024*	*Site commissioned in November 2024*
Dec-23	139.00	132.23	196.60		100.33	169.60		
Jan-24	88.67	62.10	150.21		597.70	43.20		
Feb-24	200.44	300.17	128.66		225.73	232.11		
Mar-24	197.53	141.25	195.11		96.49	110.42		
Apr-24	203.19	52.16	88.42		82.84	95.74		
May-24	167.47	142.73	175.26		177.97	89.28		
Jun-24	112.47	95.54	117.98		89.41	140.28		
Jul-24	83.13	68.28	122.14		298.00	173.09		
Aug-24	236.78	205.26	235.48		500.34	462.21		
Sept-24	761.62	669.32	587.54		3 956.73	1 052.00		
Oct-24	233.17	208.06	184.52		403.40	391.70		
Nov-24	239.11	260.31	317.81	405.60	549.95	471.84	612.26	972.86
Dec-24	225.70	248.90	209.04	169.40	523.06	211.25	476.53	320.97
Jan-25	281.50	208.66	206.17	361.53	837.37	164.90	357.86	298.09
Feb-25	141.41	117.77	124.16	134.80	1074.82	166.45	336.20	134.58
Mar-25	219.16	116.58	221.68	324.42	606.67	319.38	297.20	461.93
Apr-25	28.99	17.05	17.09	103.52	545.69	40.00	159.59	285.42
May-25	137.25	188.82	197.55	795.84	1 367.16	3 328.35	680.92	1017.92
Jun-25	193.47	157.71	86.49	294.71	880.54	521.73	632.89	605.95
Jul-25	234.16	175.53	204.16	518.00	608.54	244.65	324.47	320.14
Aug-25	264.74	220.76	295.01	780.16	844.96	350.08	900.81	655.82
Sept-25	408.66	460.06	698.09	879.81	766.81	433.04	620.12	454.92
Oct-25	-	-	-	-	-	-	-	-
Nov-25	133.37	73.55	103.60	159.81	494.30	172.72	145.83	197.33
Dec-25	55.73	46.26	67.48	56.46	161.45	99.05	207.49	473.42

Values highlighted in orange exceeded the applicable residential limit of 600 mg/m²/day
Values highlighted in red exceeded the applicable non-0residential limit of 1 200 mg/m²/day

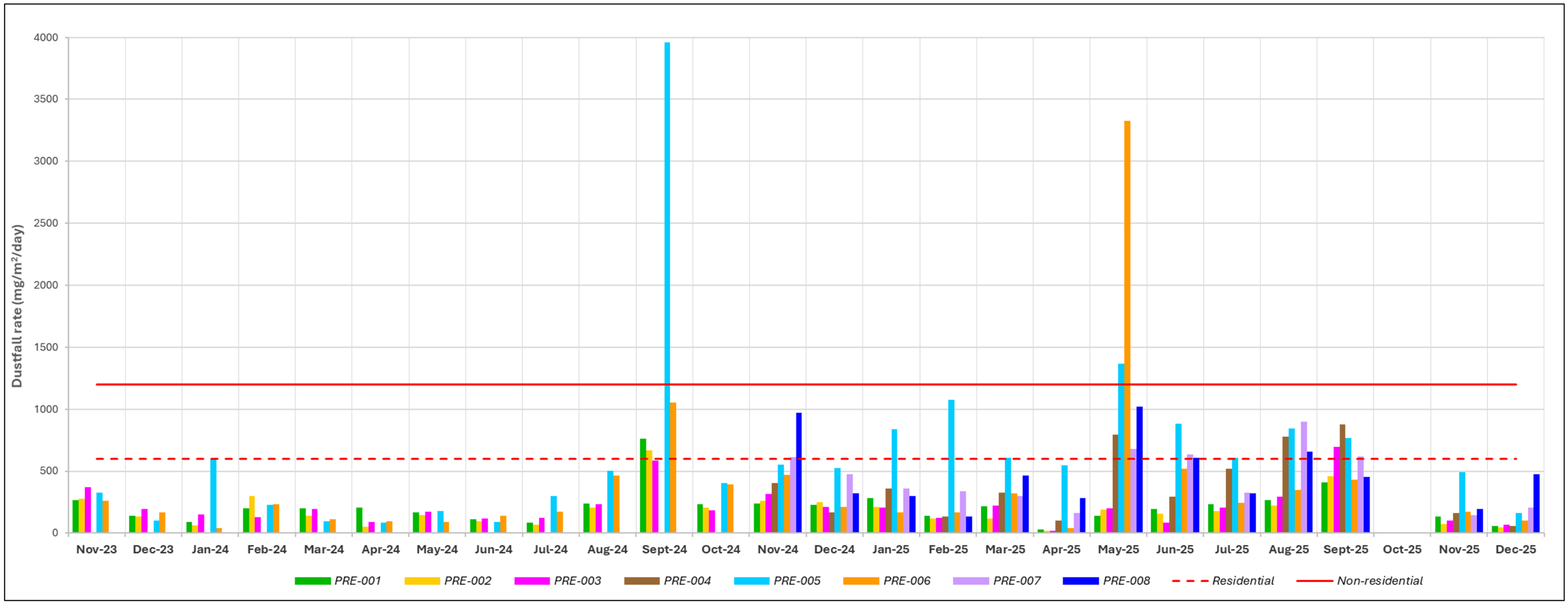

Figure 13. Dustfall results from November 2023 to December 2025 (mg/m²/day)

6.3 Aquatic Biomonitoring

Aquatic biomonitoring at the Cons Modder Mine is undertaken by Scientific Aquatic Services (Pty) Ltd ("SAS"). Monitoring is conducted on a biannual (seasonal) basis, typically during summer and winter low-flow conditions. Refer to Appendix 6 for the latest aquatic biomonitoring report relevant to the audit review period.

Aquatic biomonitoring is undertaken within an unnamed tributary of the Blesbokspruit near the Cons Modder Mine. Monitoring is conducted at three sampling points (Figure 14) to assess upstream reference conditions, potential operational influences, and downstream compliance conditions.

- CM US – upstream reference site, located upstream of 7# and 10# activities.
- CM DS – intermediate / discharge site. Historically, this monitoring point was located approximately 100 m upstream; however, from November 2024 (Gedex dewatering), this point replaced the original CM DS location. Although dewatering has ceased (January 2025) and no active discharge is currently occurring, this site continues to be monitored as part of the routine biomonitoring programme.
- CM DS2 – downstream site, located below all potential operational influences, serving as the primary compliance monitoring point.

The aquatic resource within the area of concern forms part of the C21D Quaternary catchment. The Blesbokspruit is a tributary of the Vaal River, and the broader catchment falls within the Vaal Water Management Area.

The consolidated monitoring results are summarised in Table 15.

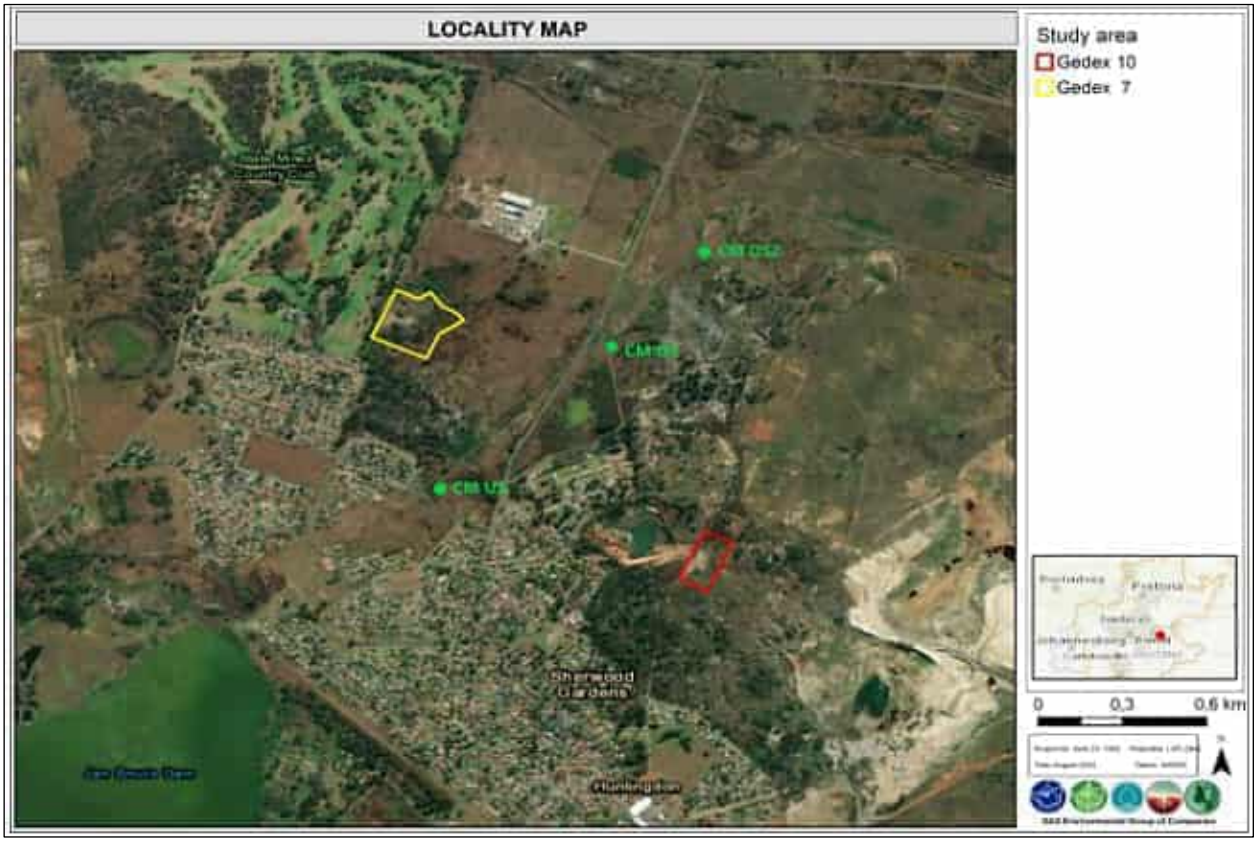

Figure 14. Aquatic biomonitoring localities (SAS, 2025)

Table 15. Consolidated aquatic biomonitoring results

Site	Period	pH	pH % Variance from baseline	EC (mS/m)	EC % Variance from baseline	DO (mg/l)	DO % Variance from baseline	DO (% saturation)	SASS5	SASS5 % Variance from baseline	ASPT	ASPT % Variance from baseline	IHAS	MIRAI	Toxicity
CM US - Upstream	***Jul-23 (Baseline)***	8.51	-	119.8	-	14.3	-	146	45	-	5.0	-	43 (Poor)	44.7 (Category D)	-
	Feb-24	6.43	-24.4	56.0	-53.3	2.57	-82.0	34.3	15	-66.7	3.0	-40	53 (Poor)	44.6 (Category D)	-
	Aug-24	7.19	-15.5	61.7	-48.5	4.59	-67.9	52.4	33	-26.7	4.1	-18	51 (Poor)	43.7 (Category D)	-
	Nov-24	6.90	-18.9	78.3	-34.6	2.84	-80	39.3	24	-46.7	3.0	-40	46 (Poor)	42.5 (Category D)	Class 2
	May-25	6.69	-24.4	56.0	-53.3	7.33	-48.7	-	-	-	-	-	-	-	Class 2
	Jul-25	7.59	-10.8	74.6	-37.7	7.56	-47.1	103.35	9	-80.0	3.0	-40	46 (Poor)	43.08 (Category D)	Class 1
	Dec-25	7.27	-14.6	53.0	-55.8	4.96	-65.3	-	-	-	-	-	-	-	Class 3
CM DS – Intermediate site (historic site, pre-Nov 2024)	***Jul-23 (Baseline)***	7.28	-	111.7	-	10.67	-	108	33	-	4.1	-	57 (Adequate)	40.0 (Category D/E)	-
	Feb-24	6.33	-13	58.0	-48.1	2.05	-20.2	28.5	21	-36.4	4.2	2.4	42 (Poor)	43.0 (Category D)	-
	Aug-24	7.00	-3.8	61.9	-44.6	4.86	-54.6	56.3	16	-75.4	4.0	-31.8	45 (Poor)	43.0 (Category D)	-
CM DS - Discharge site (Nov 2024 onwards)	***Nov-24***	7.73	-	54.5	-	2.97	-	43.4	-	-	-	-	-	-	Class 1
	May-25	6.57	-	53.3	-	7.73	-	-	-	-	-	-	-	-	Class 1
	Jul-25	7.68	-	75.1	-	6.72	-	91.82	-	-	-	-	-	-	Class 1
	Dec-25	7.28	-5.8	53.5	-	4.81	-	-	-	-	-	-	-	-	Class 2

Site	Period	pH	pH % Variance from baseline	EC (mS/m)	EC % Variance from baseline	DO (mg/l)	DO % Variance from baseline	DO (% saturation)	SASS5	SASS5 % Variance from baseline	ASPT	ASPT % Variance from baseline	IHAS	MIRAI	Toxicity
CM DS2 - Downstream site	***Jul-23 (Baseline)***	7.53	-	114.0	-	13.34	-	134.9	61	-	4.4	-	51 (Poor)	51.0 (Category D)	-
	Feb-24	6.68	-11.3	57.8	-49.3	2.23	-83.2	31.5	40	-34.4	4.0	-28.5	49 (Poor)	53.3 (Category D)	-
	Aug-24	7.35	2.2	60.0	-2.8	6.21	35.3	73.4	15	-75.4	3.0	-31.8	39 (Poor)	43.0 (Category D)	-
	Nov-24	6.86	-8.9	73.6	-35.4	4.51	-66.2	58.6	48	-61.0	4.0	-28.6	47 (Poor)	48.9 (Category D)	Class 1
	May-25	7.08	-6.0	51.2	-55.1	7.79	-41.4	-	-	-	-	-	-	-	Class 1
	Jul-25	7.70	2.3	73.5	-36.5	8.15	-38.7	111	10	-91.9	3.33	-40.5	47 (Poor)	48.2 (Category D)	Class 2
	Dec-25	7.43	-1.3	53.6	-53.0	5.33	-59.9	-	-	-	-	-	-	-	Class 3

Macro-invertebrates not assessed at CM DS discharge location, as it represents point-source water quality monitoring site
RWQO: 6.5 < pH < 8.8; EC <111 mS/m; DO > 6 mg/l
Non-compliance of the RWQOs are highlighted in orange

Water Quality:
Red text = significant deterioration
Blue text = significant improvement

Macro-Invertebrates:
A deterioration exceeding 15 % was considered significant
An improvement exceeding 15 % was considered significant

Aquatic biomonitoring results undertaken between July 2023 (baseline) and December 2025 indicate that the unnamed tributary of the Blesbokspruit remains a historically and cumulatively modified system, with no evidence of sustained deterioration attributable to mining activities.

At baseline (July 2023), elevated Electrical Conductivity (EC) was recorded at CM US, exceeding the Resource Water Quality Objectives (RWQO) and reflecting catchment-wide mining and anthropogenic pressures. Since 2024, the EC has consistently complied with the RWQO limits at all monitoring sites. Spatial comparisons throughout the monitoring period confirm that no additional dissolved salts are entering the system downstream of the mining operations.

Dissolved Oxygen (DO) exhibited temporal variability, with low saturation levels recorded during February 2024, August 2024, and December 2025. These conditions were either attributed to seasonal low flows or upstream organic pollution. Although DO non-compliance (i.e., < 6 mg/l) was recorded during December 2025 at all sites, spatial analysis did not demonstrate progressive downstream deterioration relative to upstream conditions.

pH remained largely compliant throughout the monitoring period, with only minor and temporary deviations recorded in February 2024. Measured physico-chemical parameters demonstrate temporal variability typical of a modified Highveld tributary, with no progressive deterioration between July 2023 and December 2025.

Macro-invertebrate community integrity, assessed using the Macro-invertebrate Response Assessment Index (MIRAI) Ecostatus tool, remained consistently classified as Category D (Largely Modified) at both upstream and downstream sites throughout the monitoring period. Although seasonal fluctuations in South African Scoring System (SASS5) and Average Score Per Taxon (ASPT) scores were observed, particularly during winter low-flow conditions, no ecological category shift occurred between 2023 and 2025. The ecological condition of the tributary remains consistent with long-standing catchment pressures rather than site-specific operational impacts.

Toxicity testing undertaken during and after the Gedex Pit dewatering period (November 2024 to January 2025) did not identify any persistent acute hazard associated with discharge activities. Slight acute hazard (Class 2) results were recorded at individual sites during certain monitoring rounds (CM US – May 2025 and November 2025; CM DS2 – July 2025). During the December 2025 assessment, acute hazard (Class 3) classifications were recorded at both the upstream (CM US) and downstream (CM DS2) sites, with the intermediate point (CM DS) reflecting a slight acute hazard (Class 2). Even though the toxicity hazard classification remained unchanged between sites CM US and CM DS2, there was a spatial increase in toxicity test results (*P. reticulata* % mortality) observed between sites CM DS and CM DS2, suggesting a potential downstream impact at the time of the assessment.

Between July 2023 and December 2025:

- No progressive increase in dissolved salts was recorded.
- No sustained downstream water quality deterioration attributable to the Cons Modder Mine has been identified.
- DO conditions recovered following temporary seasonal depression.
- No ecological category shift occurred.
- No sustained downstream deterioration attributable to the Cons Modder activities was identified.
- Dewatering of the pit did not result in measurable ecological or chemical impact.

The variability observed over the monitoring period is primarily attributed to seasonal dynamics and broader catchment-scale influences. Continued biannual biomonitoring and quarterly toxicity testing remain appropriate to confirm long-term stability.

6.4 Alien and Invasive Plant (AIP) monitoring

Alien and Invasive Plant (AIP) monitoring at the Cons Modder Mine is undertaken by SAS. Since the baseline winter assessment conducted in July 2023, SAS has undertaken biannual monitoring (winter and summer assessments) in accordance with the approved Alien and Invasive Plant Control Plan (AIPCP) and the provisions of the National Environmental Management: Biodiversity Act (NEM:BA; No. 10 of 2004). Monitoring includes quantitative assessments of species richness, percentage cover, recruitment dynamics and infestation levels within defined Management Units (MUs). Refer to Appendix 7 for the latest AIP monitoring report relevant to the audit review period.

The findings have been structured into two monitoring phases. Phase 1 comprises the baseline and subsequent seasonal assessments undertaken between winter 2023 and summer 2025 under the original monitoring framework. Phase 2 comprises the winter 2025 assessment, during which the monitoring design, MUs, and spatial extent were amended to reflect the expanded project footprint. Due to changes in sampling design and spatial extent, Phase 2 results are interpreted independently and are not directly compared to Phase 1 results.

6.4.1 Phase 1: August 2023 - February 2025

Monitoring was undertaken by SAS using fixed 2 m x 2 m quadrats located across nine monitoring points (Figure 15) within the project area (prior to the expanded footprint). The site was divided into two MUs: MU 1 – Fence line and buffer areas (higher ecological priority due to edge effects and potential off-site spread), and MU 2 – Active mining footprint areas (already transformed habitat).

Figure 15. Phase 1: Fixed AIP monitoring points (SAS, 2025)

Across the Phase 1 monitoring period, several NEM:BA-listed invasive species were consistently recorded within the project area. These included Category 1b species such as:

- *Datura stramonium*
- *Argemone ochroleuca*
- *Flaveria bidentis*
- *Ipomoea purpurea*
- *Verbena bonariensis*
- *Cirsium vulgare*
- *Eucalyptus camaldulensis*
- *Melia azedarach*
- *Pinus pinaster*
- *Cortaderia selloan*

In addition, *Acacia mearnsii* (Category 2) and *Acacia baileyana* (Category 3) were recorded in isolated areas. Non-listed but problematic species such as *Bidens pilosa*, *Amaranthus hybridus* and *Gomphrena celosioides* were also observed within disturbed habitats.

Seasonal variation in species richness (number of AIP species) was evident (Figure 16 and Figure 17), with higher richness generally recorded during summer assessments and reduced richness during winter surveys.

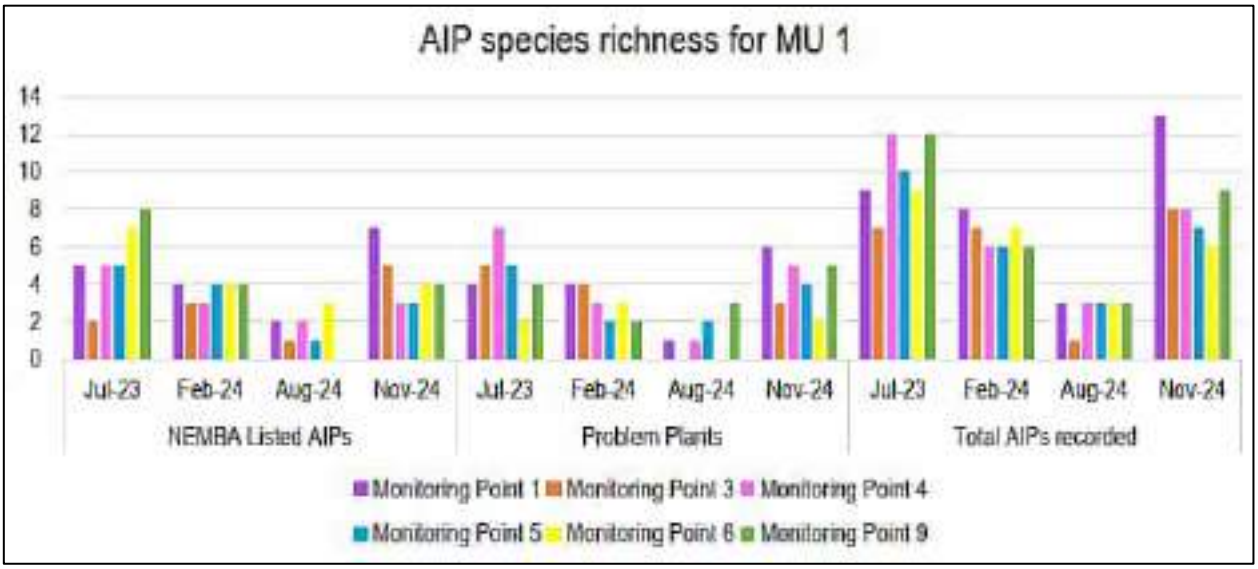

Figure 16. Phase 1: AIP richness at MU 1 since July 2023 (SAS, 2025)

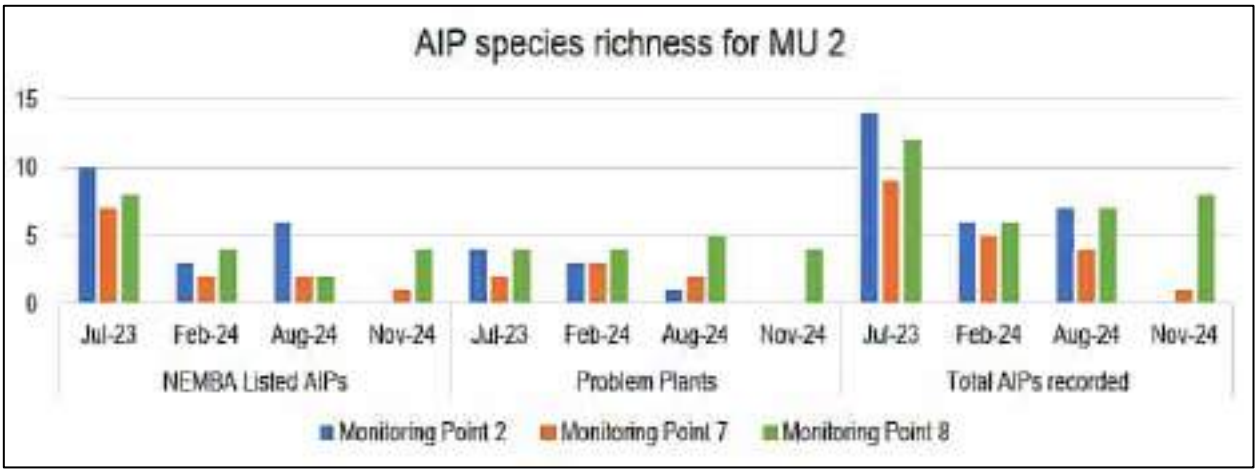

Figure 17. Phase 1: AIP richness at MU 2 since July 2023 (SAS, 2025)

During the Phase 1 monitoring period, most quadrats were classified within the Medium Level of Infestation (20 – 40 % cover), primarily within fence line and degraded buffer areas. No consistent High (> 40 %) infestation levels were recorded across the Phase 1 monitoring period. Elevated cover values recorded during the baseline assessment were not sustained across subsequent monitoring events. The observed reduction in AIP cover within certain monitoring points corresponded with mechanical clearing associated with infrastructure development and herbicide application.

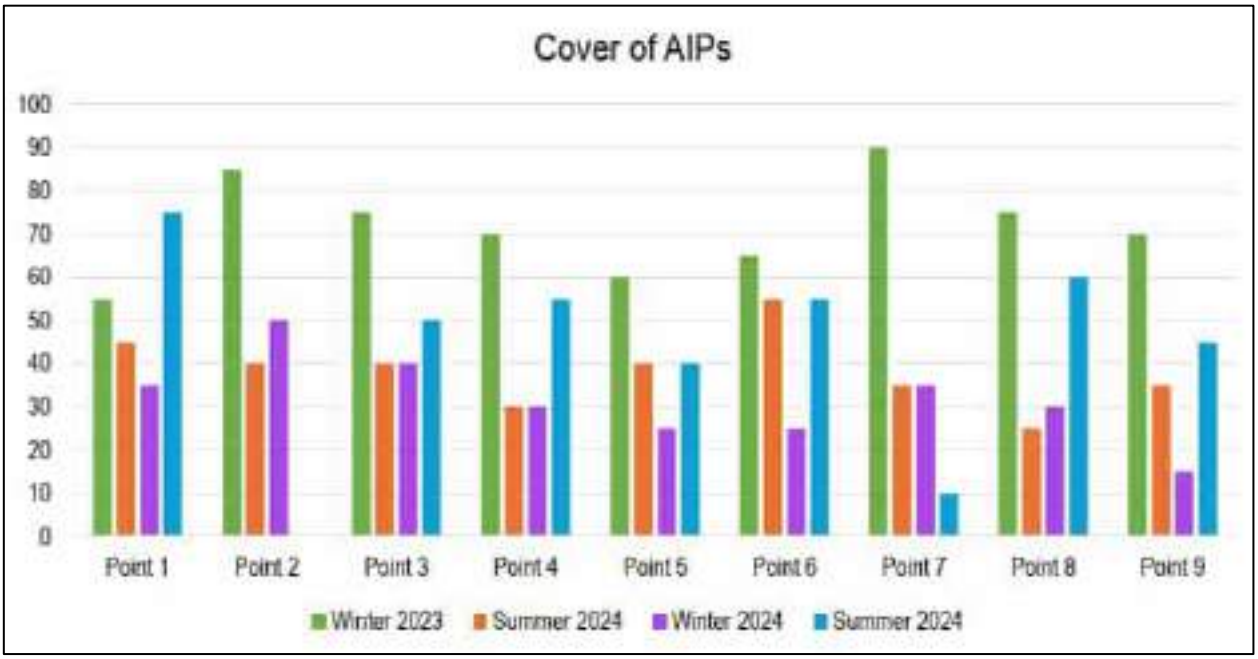

Figure 18. Phase 1: Percentage cover per monitoring point (SAS, 2025)

New seedlings of invasive species were repeatedly observed within disturbed areas of the site, indicating the presence of a viable soil seed bank and the need for ongoing follow-up control. This was particularly evident for *Datura stramonium, Argemone ochroleuca* and *Flaveria bidentis*.

The presence of seedlings and juvenile individuals confirms continued germination following disturbance and demonstrates the persistence of the soil seed bank. However, dead individuals were also recorded during monitoring, indicating that implemented control interventions were having an effect in limiting establishment and progression to maturity.

Infestation patterns recorded during Phase 1 were strongly correlated with areas of soil disturbance, grading and infrastructure development, rather than indicating a systemic failure of control measures.

Recruitment trends recorded during Phase 1 (winter 2023 to summer 2025) are presented in Figure 19. Recruitment was consistently recorded across multiple monitoring points during the Phase 1 monitoring period. Seasonal variation is evident, with generally higher recruitment observed during summer assessments. Recruitment levels remained proportional to total species richness and did not show a progressive increase over time. Most recruitment events were associated with disturbance-adapted annual species within recently cleared or graded areas.

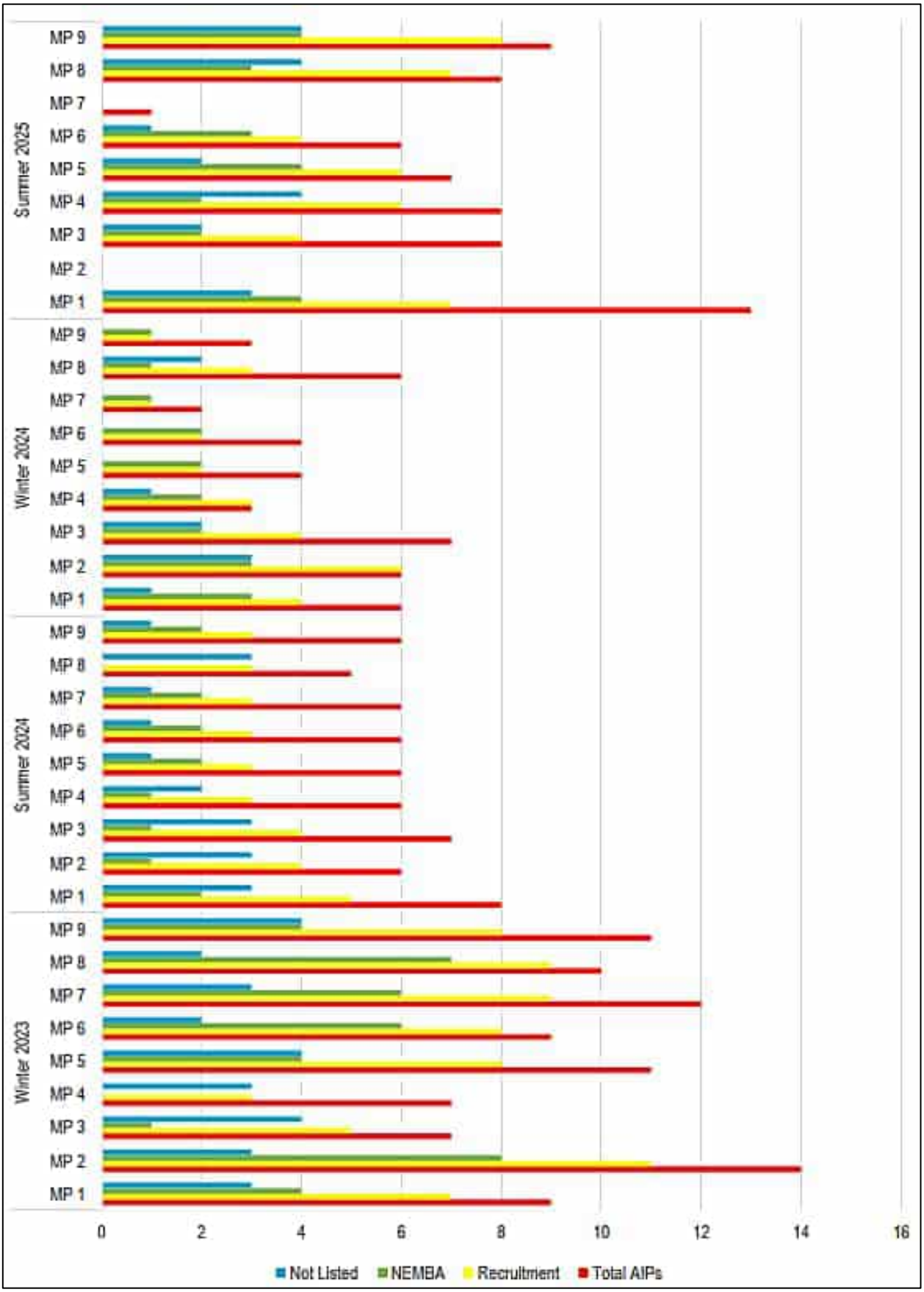

Figure 19. AIP recruitment trends across Phase 1 monitoring period (SAS, 2025)

6.4.2 Phase 2: Revised monitoring network

Prior to the winter 2025 sampling event, the monitoring framework was revised to accommodate the changes to the mining footprint. To ensure spatial representativity and continued compliance with the NEM:BA, the monitoring plan was adapted as follows:

- Monitoring points increased from nine to 12
- Sampling design changed to 5 m radius fixed sampling points
- Management Units redefined as:
    - MU 1: Transformed areas with mining infrastructure
    - MU 2: Secondary and degraded habitat.

This revision represents adaptive management aligned with changes to the approved footprint and does not reflect an increase in infestation. Refer to Figure 20 and Figure 21.

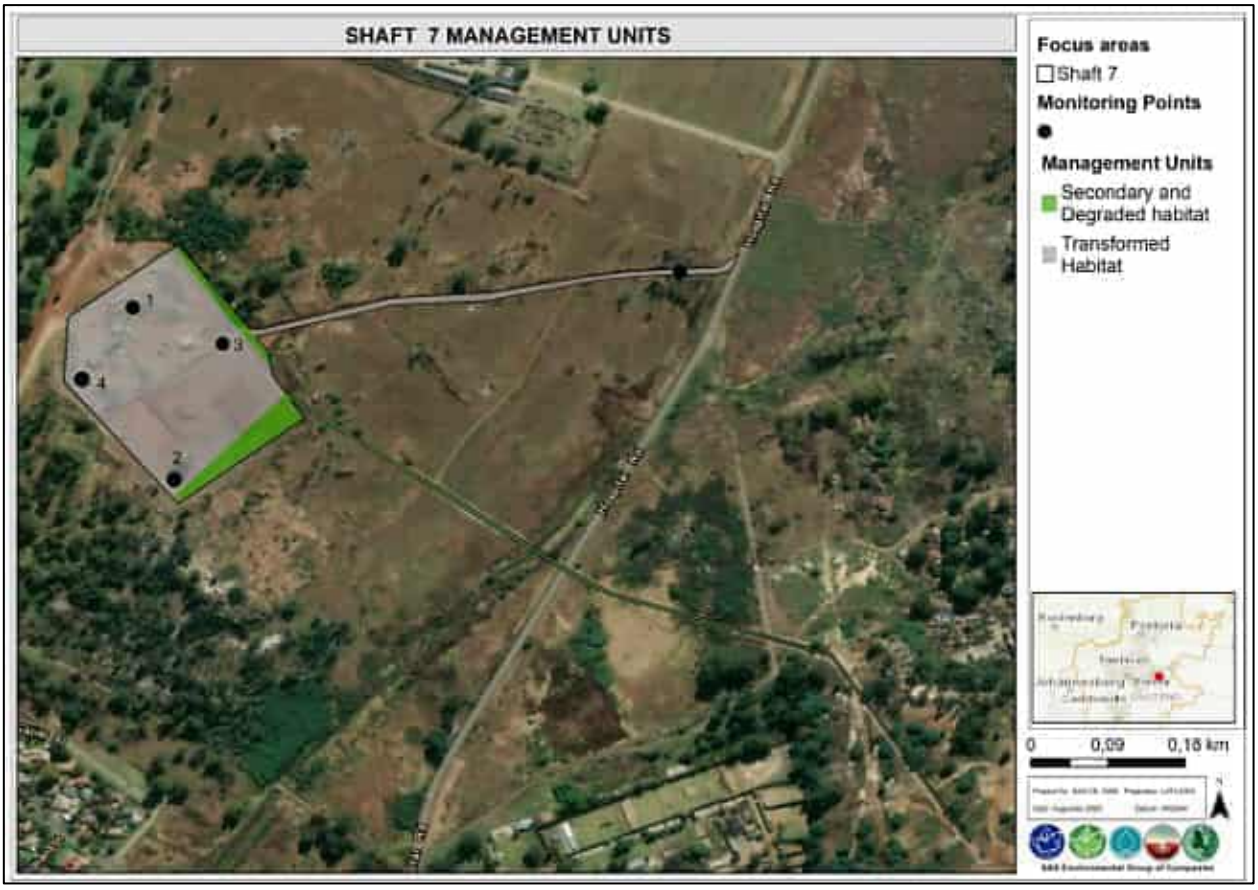

Figure 20. Phase 2: Updated monitoring points and revised MUs associated with 7# as of winter 2025 (SAS, 2025)

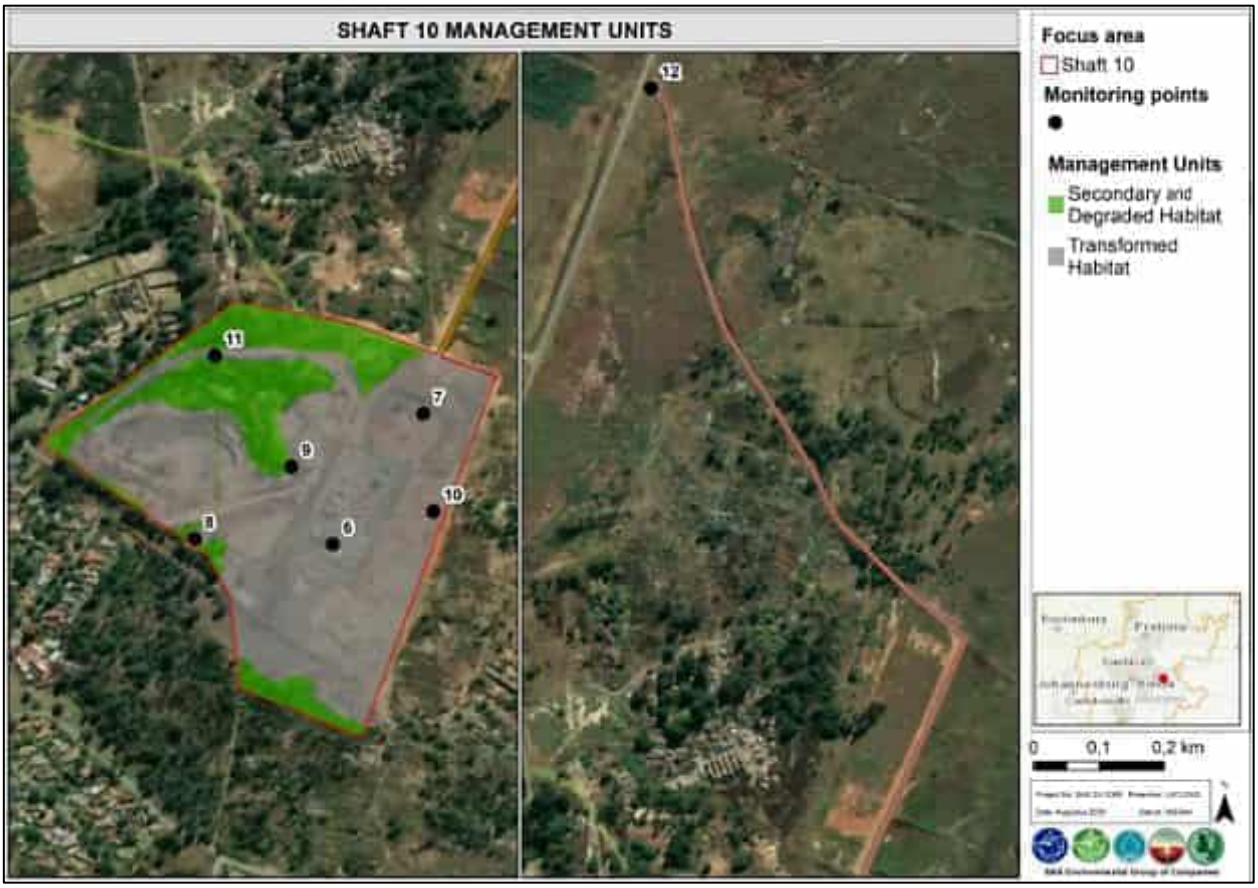

Figure 21. Phase 2: Updated monitoring points and revised MUs associated with 10# as of winter 2025 (SAS, 2025)

The winter 2025 assessment recorded the continued presence of several NEM:BA Category 1b species (Table 16), including:

- *Datura stramonium*
- *Argemone ochroleuca*
- *Flaveria bidentis*
- *Ipomoea purpurea*
- *Eucalyptus camaldulensis*
- *Pinus pinaster*
- *Cortaderia selloana*

Category 2 and 3 species were recorded in isolated instances. Non-listed disturbance species persisted within degraded habitat areas. Species distribution was primarily associated with recently disturbed and secondary habitat areas (Figure 22).

Table 16. AIP species recorded during winter 2025

Species Name	NEM:BA Category	10#		7#	
		MU 1	MU 2	MU 1	MU 2
Acacia baileyana	3		X		
Acacia mearnsii	2		X		
Amaranthus hybridus	NL		X	X	
Argemone ochroleuca subsp. *ochroleuca*	1b		X	X	
Bidens pilosa	NL	X	X	X	X
Cortaderia selloana	1b	X	X		
Datura stramonium	1b	X		X	X
Eucalyptus camaldulensis	1b		X	X	X

Species Name	NEM:BA Category	10#		7#	
		MU 1	MU 2	MU 1	MU 2
Euphorbia heterophylla	NL			X	
Flaveria bidentis	1b			X	X
Gomphrena celosioides	NL	X	X		
Ipomoea purpurea	1b	X	X		
Melia azedarach	1b		X		
Paspalum dilatatum	NL		X		
Pinus pinaster	1b		X		
Plantago lanceolata	NL	X		X	
Schkuhria pinnata	NL	X	X		
Solanum mauritianum	1b	X	X		
Sonchus asper	NL	X			
Tagetes minuta	NL	X	X		X
Taraxacum officinale	NL	X	X	X	X
Tipuana tipu	3	X	X		
Verbena bonariensis	3b	X		X	X
Yucca aloifolia	NL		X		
	Total AIPs	**15**	**18**	**10**	**7**

NL = Not listed

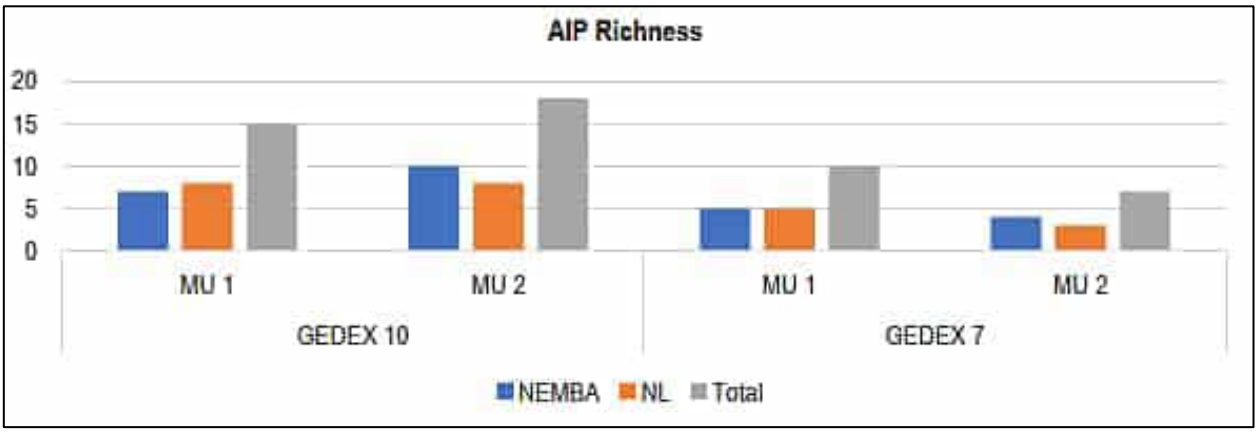

Figure 22. Summary of AIP richness observed within the Cons Modder Mine for winter 2025 (SAS, 2025)

During the winter 2025 assessment, AIP cover varied across monitoring points, with several locations recording moderate to high localised cover values. Higher cover percentages were primarily associated with recently disturbed or degraded habitat areas. Although certain monitoring points recorded elevated cover, these infestations were spatially confined and not indicative of site-wide pervasive invasion. Elevated cover values recorded at specific monitoring points reflect dense localised infestation within the defined 5 m sampling radius and should not be interpreted as representing uniform infestation across the entire MU or mining area.

Large sections of the project area had been cleared of vegetation prior to the assessment, resulting in heterogeneous cover patterns across the site.

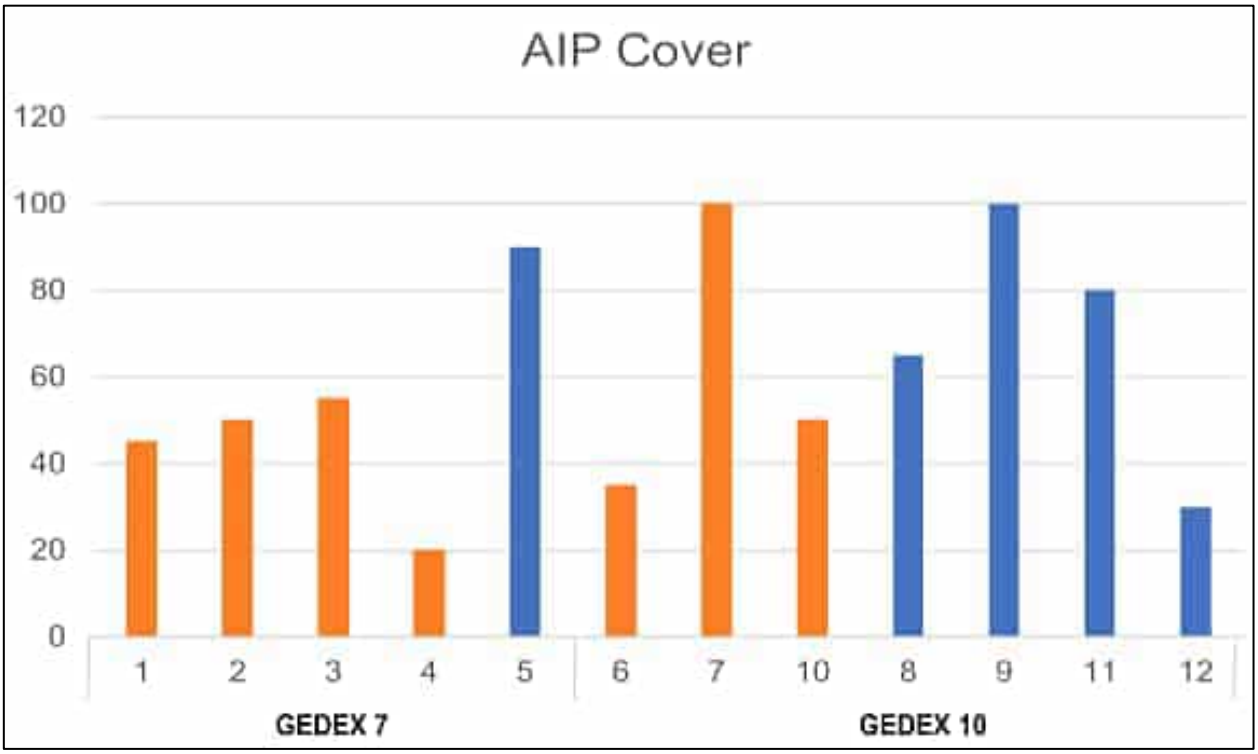

Figure 23. Average AIP cover per monitoring point - orange bars indicate MU 1 and blue bars indicate MU 2 of winter 2025 (SAS, 2025)

The winter 2025 assessment indicated that AIP proliferation within the expanded footprint is moderate to moderately high, based on infestation levels and distribution patterns. Vegetation clearing and herbicide application, particularly within 10#, have contributed to a reduction in AIP abundance compared to the initial 2023 baseline. However, the pit area and areas north of 10# remain high-priority zones with significant AIP proliferation.

Control of AIPs is regarded as critical to prevent further spread within and beyond the mining area. Concern is associated with several NEM:BA Category 1b species, which are legally required to be controlled. These species must be prioritised in accordance with the approved AIP Control Plan.

The specialist recommends continued implementation of the AIP Control Plan, including:

- Bi-annual monitoring of species diversity and cover (for three years post-initial clearing, thereafter biennially during the growing season)
- Ongoing, timeous implementation of control measures within MUs
- Formal documentation of all control interventions to assess effectiveness
- Annual updating of the AIP Control Plan, including species-specific control measures and revised priority areas
- Prioritising NEM:BA-listed species and high priority areas (particularly MU 1)
- Implementation of additional mitigation should negative trends be observed.
- While control of NEM:BA-listed species is legally mandated, management of non-listed problem plants is strongly recommended due to their contribution to habitat degradation.

6.5 Ground vibration and air blast monitoring

Ground vibration and air blast monitoring and reporting commenced in November 2023 and is undertaken by an independent specialist, Blast Management and Consulting (Pty) Ltd ("BMC"). Refer to Appendix 8 for the latest ground vibration and air blast monitoring report relevant to the audit review period. BMC deploys three permanently installed *Instantel* seismographs at fixed community monitoring points adjacent to the mine (Golf Course, and two residential properties). Refer to Figure 24. Blast and vibration monitoring points. Monitoring is undertaken continuously (24 hours per day), with data retrieved and reported on a monthly basis. Monitoring is undertaken in accordance with the DMPR's Mine Health and Safety Act requirements and associated Codes of Practice.

Figure 24. Blast and vibration monitoring points (BMC, 2026)

Table 17 presents a consolidated summary of the monthly ground vibration and air blast monitoring results for the period November 2023 to January 2026. No exceedances of the applicable ground vibration (25 mm/s) or air blast (134 dB(L)) limits were recorded during the review period. No structural damage attributable to blasting was reported at any of the monitored community receptors.

Instances where no blast-related events were recorded are attributed to the vibration and / or air blast levels generated by the blasts remaining below the seismograph trigger thresholds (i.e., 1.20 mm/s Peak Particle Velocity [PPV] for ground vibration and 120 dB for air blast), and therefore not initiating a recording.

Isolated instances were recorded where events did not correspond directly with the mine's blasting information; these were interpreted by the monitoring specialist as likely attributable to external sources and not associated with exceedances of applicable limits. In January 2024, two air blast events exceeded the 125 dB complaints threshold; however, these remained below the 134 dB(L) damage criterion and were therefore compliant with the accepted safe blasting standard.

Table 17. Summary of ground vibration and air blast monitoring results (November 2023 - January 2026)

Month and year	Recorded blast-related events	Ground vibration compliance	Air blast compliance	Exceedances	Damage reported	Comments
Nov-23	12	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Monitor issue noted (loose wire at Point 02 affecting recording)
Dec-23	0	N/A	N/A	None	None	No blast-related events recorded
Jan-24	6	Within 25 mm/s limit	Within 134 dB(L) limit	Two air blast events > 125 dB (complaints threshold), < 134 dB(L)	None	Air blast exceeded 125 dB complaints threshold (still compliant with 134 dB(L) limit)
Feb-24	0	N/A	N/A	None	None	No events could be matched with blast information received
Mar-24	11	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	All events within safe blasting criteria
Apr-24	2	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	-
May-24	1	Within 25 mm/s limit (no vibration recorded)	Within 134 dB(L) limit	None	None	Air blast only; no ground vibration recorded
Jun-24	0	N/A	N/A	None	None	No events recorded
Aug-24	0	N/A	N/A	None	None	No blasting information received for the month
Oct-24	2 (1 blast)	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Two possible air blast triggers identified; interpreted as one blast event
Nov-24	2 (1 blast)	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Events did not correspond with blast information received; possible outside-source contribution
Dec-24	0	N/A	N/A	None	None	-
Jan-25	1	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Event did not correspond with blast information received
Feb-25	0	N/A	N/A	None	None	-
Mar-25	3	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Events interpreted as outside-source / open-cast type signature; not matched to mine blast info
Apr-25	3	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Events interpreted as outside-source / open-cast type signature; not matched to mine blast info
May-25	0	N/A	N/A	None	None	-
Jun-25	1	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Event matched to blast information
Jul-25	2	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Events matched to blast information
Aug-25	3	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	Events matched to blast information

Month and year	Recorded blast-related events	Ground vibration compliance	Air blast compliance	Exceedances	Damage reported	Comments
Sept-25	0	N/A	N/A	None	None	-
Oct-25	0	N/A	N/A	None	None	No blast-related events recorded
Nov-25	7	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	One event did not correspond with blast information; possible outside-source contribution
Dec-25	7	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	All events matched to blast information
Jan-26	9	Within 25 mm/s limit	Within 134 dB(L) limit	None	None	All events matched to blast information

Overall, the blast monitoring programme is considered adequate, independently implemented, and effective in demonstrating compliance with the applicable ground vibration and air blast performance criteria.

6.6 Noise

Environmental noise monitoring at the Cons Modder Mine has been conducted by Rayten on a quarterly basis since April 2024. Refer to Appendix 9 for the latest noise monitoring report relevant to the audit review period. Monitoring included daytime and night-time measurements at six fixed monitoring locations (Figure 25) positioned at sensitive receptors around 7# and 10# and surrounding residential areas. Monitoring was undertaken in accordance with the South African National Standards (SANS) 10103: 2008 and SANS 10328: 2008, with results assessed against the urban district guideline limits of 55 dB(A) (daytime) and 45 dB(A) (night-time).

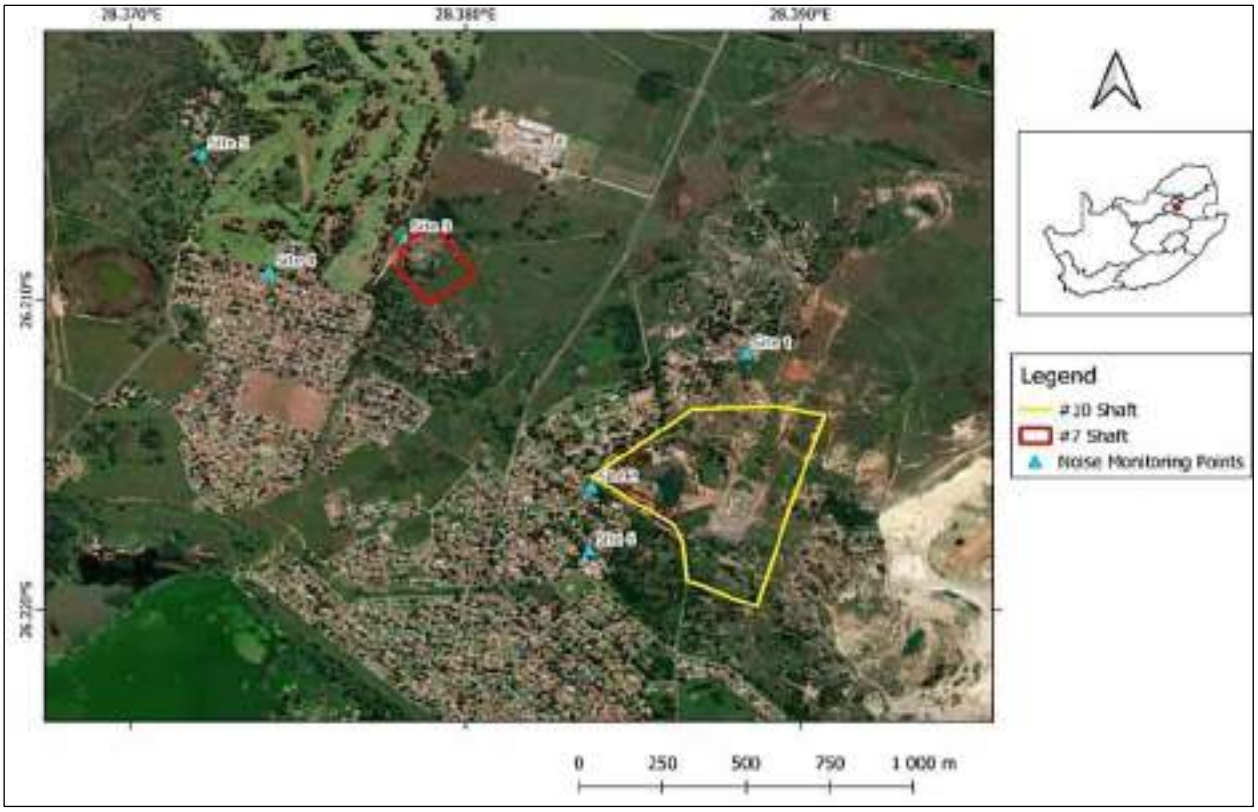

Figure 25. Noise monitoring network (Rayten, 2025)

Noise monitoring was typically undertaken over three consecutive days per quarter. This included one daytime monitoring session (generally conducted around midday) and two night-time monitoring sessions on the subsequent days, comprising a late-night period (22:00 - 23:30) and an early-morning period (00:00 - 01:30). Night-time monitoring was not undertaken at Site 1 due to site-specific access and safety constraints. The daytime and night-time results presented in Table 18 reflect the average measured levels for the respective monitoring periods. The minimum and maximum sound levels recorded during the three-day monitoring period are also provided to illustrate the range of observed conditions. Average noise levels recorded during the reporting period are illustrated in Figure 26.

Table 18. Average daytime and night-time noise levels, with corresponding minimum and maximum recorded sound levels during the quarterly monitoring period

Monitoring period		Site 1 – Emagaleni Informal Settlement			Site 2 – Corner Abramowitz and Pfuhl Street			Site 3 – Shaft 7 main gate			Site 4 – Hewitt Street, No. 21			Site 5 – Behind golf course			Site 6 – Corner Mckenzie and Abramowitz Street		
Quarter	Time	Average noise dB(A)	Max noise dB(A)	Min noise dB(A)	Average noise dB(A)	Max noise dB(A)	Min noise dB(A)	Average noise dB(A)	Max noise dB(A)	Min noise dB(A)	Average noise dB(A)	Max noise dB(A)	Min noise dB(A)	Average noise dB(A)	Max noise dB(A)	Min noise dB(A)	Average noise dB(A)	Max noise dB(A)	Min noise dB(A)
2024 Q1 April	Day	**55.8**	**72.7**	37.9	**58.3**	**86.5**	37.6	54.3	**64.1**	46.8	45.1	**57.8**	38.8	52.2	**69.1**	39.4	51.9	**67.8**	40.1
	Night	-	-	-	**53.0**	**78.1**	36.2	**60.6**	**64.1**	**57.6**	**49.5**	**65.3**	35.5	44.5	**66.3**	35.6	**45.6**	**54.7**	36.5
2024 Q2 June	Day	50.1	**72.2**	41.6	**56.9**	**92.4**	38.7	49.8	**70.8**	40.2	53.2	**76.7**	37.0	51.3	**69.1**	34.4	**55.1**	**78.7**	36.0
	Night	-	-	-	**58.9**	**75.0**	**45.5**	**60.5**	**69.3**	**57.5**	**50.7**	**72.9**	**45.6**	**46.3**	**76.3**	40.6	**48.1**	**89.8**	42.2
2024 Q3 November	Day	50.3	**73.6**	36.1	**56.9**	**84.5**	40.3	**55.4**	**84.4**	33.0	**57.4**	**82.9**	36.6	42.4	**58.8**	36.3	**58.5**	**75.7**	40.7
	Night	-	-	-	**45.8**	**60.4**	39.7	**58.6**	**71.8**	**54.4**	**48.9**	**75.5**	39.8	**47.6**	**69.1**	38.4	**57.3**	**79.5**	35.2
2024 Q4 Feb25	Day	**65.5**	**89.7**	**55.3**	55.0	**81.3**	43.7	**66.2**	**90.3**	**56.6**	54.0	**75.6**	45.0	54.3	**77.6**	44.6	**66.6**	**78.7**	48.3
	Night	-	-	-	**50.3**	**81.9**	39.0	**62.1**	**93.8**	**52.8**	**55.6**	**97.4**	42.1	**55.0**	**86.2**	43.6	**54.1**	**89.6**	36.2
2025 Q1 June	Day	49.5	**78.6**	36.9	**61.0**	**90.1**	41.1	55.0	**78.9**	41.9	50.4	**76.1**	35.3	52.0	**72.9**	37.7	**55.7**	**72.9**	37.7
	Night	-	-	-	43.8	**73.5**	36.1	**53.3**	**68.5**	**48.4**	**49.6**	**78.4**	36.2	43.5	**61.9**	35.8	39.5	**63.9**	33.3
2025 Q2 August	Day	52.6	**82.0**	47.7	**60.5**	**85.3**	49.1	**55.7**	**78.7**	43.8	**56.7**	**82.8**	39.8	49.7	**67.5**	42.9	**58.3**	**79.8**	40.8
	Night	-	-	-	**45.6**	**68.8**	40.2	**51.9**	**81.7**	36.8	**51.7**	**77.7**	38.8	**45.1**	**70.5**	37.1	**49.5**	**85.4**	36.1
2025 Q3 November	Day	49.1	**71.1**	39.0	**57.8**	**88.8**	38.5	**59.1**	**82.2**	49.2	**56.7**	**81.7**	41.3	50.7	**68.2**	41.0	**57.8**	**76.2**	38.6
	Night	-	-	-	**49.6**	**89.0**	33.1	**54.4**	**86.7**	**47.6**	**46.6**	**70.8**	36.1	**46.1**	**79.0**	32.8	**52.7**	**80.1**	32.0

*Values in **red** exceeded the applicable SANS urban guideline of 55 dB(A) for daytime noise levels*
*Values in **orange** exceeded the applicable SANS urban guideline of 45 dB(A) for night-time noise levels*

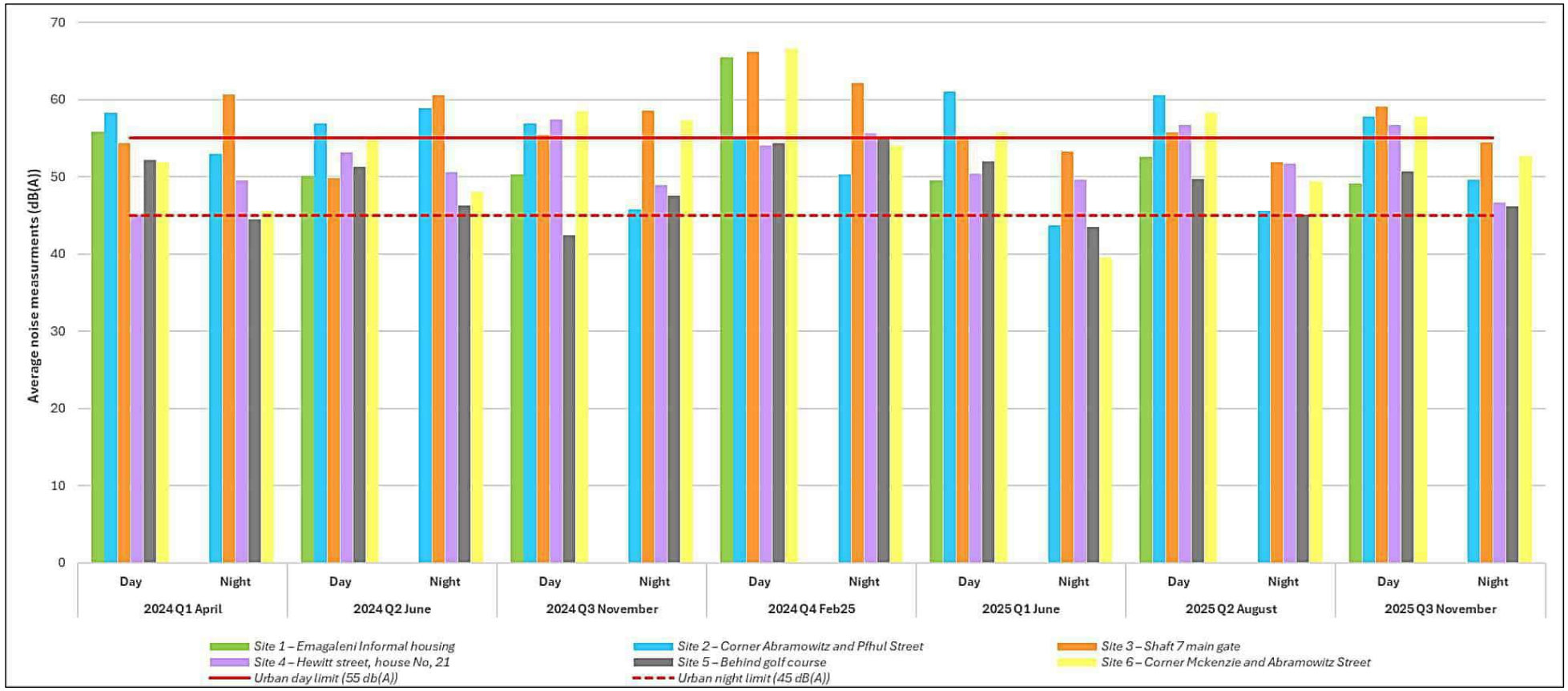

Figure 26. Average daytime and night-time noise levels recorded during the monitoring period

The results indicate recurring exceedances of the SANS 10103: 2008 urban district guideline limits at receptors located closest to 7# and, to a lesser extent, 10#. Daytime exceedances are recurrent at Sites 2, 3, 4 and occasionally 6, with contributions from mining-related activities (ventilation fans, conveyor systems, crushing, articulated dump trucks, and reverse alarms) as well as existing urban background noise such as traffic, aircraft and domestic sources. Night-time exceedances are more persistent and pronounced, particularly at Sites 3 and 4 near 7#, where continuous ventilation and fixed plant operations are repeatedly identified as the dominant contributors. Noise levels at certain receptors, notably Site 2, increased relative to the 2018 pre-mining baseline (45.5 dB(A)), indicating a shift from a predominantly suburban acoustic character to a more industrialised noise environment. Specialist recommendations for noise mitigation include noise barriers, relocation of fans underground, attenuation of surface ventilation fans, and restriction of high-noise night-time activities.

In addition to the independent quarterly monitoring undertaken at the fixed receptor locations, the mine also conducted routine noise measurements at 7# and 10# to assess operational noise levels at the source. Source measurements indicate that the main on-site noise contributors are the surface ventilation and exhaust fans, compressors, winders, Scot winches and associated material loading areas. Measured source levels for these activities generally range from approximately 73 to 107 dB(A) during the day, which exceeds the applicable SANS industrial daytime guideline of 70 dB(A). The limited night-time source measurements available indicate levels of approximately 60 to 88.1 dB(A), exceeding the applicable SANS industrial night-time guideline of 60 dB(A) in several instances, particularly near exhaust fans, loading areas and residential interface points close to operations. The highest levels are generally associated with fixed mechanical plant and mobile or intermittent operational activities at both 7# and 10#, particularly the ventilation and fan infrastructure, compressors, and winder or winch areas. These findings indicate that mitigation should focus on the individual high-noise sources identified on site, with targeted efforts to reduce emissions from ventilation fans, compressors, winders, winches and other noisy operational areas to reduce the propagation of excessive noise beyond the mine boundary and limit off-site exposure at nearby receptors.

It is acknowledged that mining is inherently industrial in nature and typically involves fixed plant, mobile equipment and material handling activities that generate continuous and intermittent noise. While the surrounding area is classified as an urban district according to the SANS 10103: 2008, and the corresponding guideline limits therefore apply, it is acknowledged that achieving urban district noise limits at receptors located in proximity to active mining infrastructure can be challenging in practice. Noise management should focus on the implementation of reasonable and practicable mitigation measures to minimise noise impacts and, where feasible, reduce exceedances, while considering the inherent operational characteristics of a working mine.

6.7 Ground- and surface water quality monitoring

Ground- and surface water monitoring has been routinely conducted by Groundwater Square Consulting Groundwater Specialists (“Groundwater Square”) at the Cons Modder Mine. Refer to Appendix 10 for the latest ground- and surface water monitoring report relevant to the audit review period. Surface water quality has been monitored monthly since November 2023, groundwater quality has been monitored on a quarterly basis since February 2025, and groundwater levels have been monitored monthly since February 2025.

The Cons Modder WUL does not include numerical limits for the monitored ground- and surface water quality parameters; therefore, the results were assessed against NKGM's WUL limits (wastewater discharge limits and water resource protection limits), given the proximity of the two operations and their shared catchment context. Water quality was also assessed against the SANS 241: 2015 Drinking Water guidelines for comparative purposes. Results were further assessed against established baseline conditions for both surface water and groundwater, as well as the applicable Resource Quality Objectives (RQOs) for the Jan Smuts Stream (as determined by SAS in June 2023) and the published RQOs in GN 468 of 2014 (downstream node Environmental Water Requirement [EWR] 11). These guideline concentrations are displayed in Table 19 and Table 20.

Table 19. SANS Drinking Water guidelines and NKGM WUL limits (Groundwater Square, 2025)

Parameter	SANS 2006 Target value	SANS 2006 Critical value	SANS 241:2015 Standard limits	NKGM WUL Limits Wastewater (mine water monitoring)	NKGM WUL Limits Water resource protection (groundwater & surface water)
pH	9.5	11	≥ 5 to ≤ 9.5	5.5 - 9.5	> 6.5
Electrical conductivity (EC) (mS/m)	150	370	≤ 170	<63	-
Total dissolved solids (TDS) (mg/l)	1000	2400	≤ 1 200	<350	-
Chloride (Cl) (mg/l)	200	600	≤ 300	60	< 196
Sulphate (SO_4) (mg/l)	400	600	≤ 250 (aesthetic) ≤ 500 (acute)	<52	< 400
Sodium (Na) (mg/l)	200	400	-	62	< 200
Calcium (Ca) (mg/l)	150	300	-	32	< 150
Nitrate (NO_3) (mg/l)	10	20	≤ 12	2	-
Magnesium (Mg) (mg/l)	70	100	-	16	< 79
Fluoride (F) (mg/l)	1	1.5	-	0.3	-
Potassium (K) (mg/l)	50	100	-	11	-
Aluminium (Al) (mg/l)	0.3	0.5	≤ 0.30	0.05	-
Arsenic (As) (mg/l)	-	-	≤ 0.01	<0.05	-
Chromium (Cr) (mg/l)	-	-	≤ 0.05	1	-
Copper (Cu) (mg/l)	-	-	≤ 2	0.2	-
Iron (Fe) (mg/l)	0.2	2	≤ 0.30 (aesthetic) ≤ 2 (chronic)	0.1	-
Manganese (Mn) (mg/l)	0.1	1	≤ 0.40 (aesthetic) ≤ 0.10 (chronic)	0.15	-
Zinc (Zn) (mg/l)	-	-	≤ 5	1	-
Dissolved oxygen (DO) (mg/l)	-	-	-	-	> 6.5
Ammonia (NH_3) (mg/l)	-	-	-	-	< 0.007
Total Inorganic Nitrogen (mg/l)	-	-	-	-	< 4
Phosphate (PO_4) (mg/l)	-	-	-	-	< 0.125
Chemical Oxygen Demand (COD) (mg/l)	-	-	-	57	-
Total hardness (mg/l)	-	-	-	175	-
Suspended solids (SS) (mg/l)	-	-	-	25	-

Table 20. Jan Smuts wetland baseline qualities and RQOs (Groundwater Square, 2025)

Parameter	Jan Smuts Upstream (Nov 2016)	Jan Smuts Downstream (Nov 2016)	Jan Smuts Wetland SAS (Jun 2023)	GN 665 (2013) S21(f) General Limit	GN 665 (2013) S21(f) Special Limit	Jan Smuts Wetland Objective SAS (Jun 2023)	RQO GN 468 (2014) EWR 11
pH	8.9	8.3	6.5	5.5 - 9.6	5.5 - 7.5	-	-
EC (mS/m)	40	36	57.8	-	-	127.8	≤ 111
TDS (mg/l)	-	-	500	-	-	-	-
Cl (mg/l)	68	62	49	-	-	-	-
Total alkalinity (T.Alk) (mg/l)	51	51	-	-	-	-	-
SO_4 (mg/l)	49	< 40 (38)	90	-	-	-	-
F (mg/l)	-	-	0.2	1	1	1	≤0.3
Na (mg/l)	37	32	44	-	-	-	-
Ca (mg/l)	19	21	39	-	-	-	-
NO_3 (mg/l)	2.9	2.4	< 0.1	15	1.5	-	-
Mg (mg/l)	10	8.7	17	-	-	-	-
K (mg/l)	8.8	8.7	2.4	-	-	-	-
Al (mg/l)	0.00244	0.01249	< 0.001	-	-	-	≤ 0.150
As (mg/l)	0.00354	0.00441	0.001	0.02	0.01	0.02	≤ 0.130
Cr (mg/l)	0.00011	0.00026	<0.001	-	-	-	-
Cobalt (Co) (mg/l)	0.001	0.00067	-	-	-	-	-
Cu (mg/l)	0.00391	0.00662	-	-	-	-	≤ 0.008
Fe (mg/l)	<0.1	<0.1	0.114	0.3	0.3	0.3	0.114
Mn (mg/l)	<0.1	<0.1	0.046	0.1	0.1	0.1	≤ 1.30
Nickel (Ni) (mg/l)	0.00681	0.00402	-	-	-	-	-
Lead (Pb) (mg/l)	0.00006	0.00006	0.001	0.01	0.006	0.01	≤ 0.013
DO (mg/l)	-	-	-	-	-	-	-
COD (mg/l)	-	-	52	75	30	20	-
Ammonium (NH_4) (mg/l)	-	-	< 0.1	6	2	-	-
PO_4 (mg/l)	-	-	<0.1	10	1	-	-
SS (mg/l)	-	-	-	25	10	-	-

6.7.1 Surface water

Surface water was monitored monthly at two locations upstream and downstream of the Jan Smuts stream. In addition, water from the Gedex Pit was sampled in August 2024. The surface water monitoring points are illustrated in Figure 27, and the consolidated analytical results are presented in Table 21.

The surface water results demonstrate a seasonal pattern, with TDS decreasing during the wet season (November 2023 to May 2024), increasing during the dry season (mid-2024 to early 2025), and repeating this cycle into 2025, confirming climatic control on concentrations. From June 2025 onwards, a deviation between upstream (GSW-2) and downstream (GSW-1) was observed, particularly for EC, TDS and major ions (Ca, Mg, Na, K, Cl and SO_4), with downstream concentrations consistently higher. However, these values remain broadly comparable to, or only marginally above, baseline levels reported in November 2023, apart from SO_4, which continues to show a cyclic upward trend and higher seasonal peaks relative to the previous cycle. The downstream mean TDS concentration (323 mg/l) was slightly higher than the upstream mean (287 mg/l).

Occasional exceedances of the NKGM WUL limits were recorded for pH and PO_4, while DO exceedances were more frequent. SS generally did not conform to RQO targets, particularly downstream. Slightly elevated micro-element concentrations (e.g. Mn and Cu, and to a lesser extent Fe) are consistent with the receiving environment. Hydrochemical characterisation indicates magnesium-sodium-potassium-bicarbonate to magnesium-sulphate water upstream, predominantly magnesium-sulphate downstream, and magnesium-bicarbonate character in the August 2024 Gedex Pit sample. Overall, the data indicated that the Gedex Pit dewatering did not result in a noticeable or significant impact on the receiving environment in terms of surface water quality.

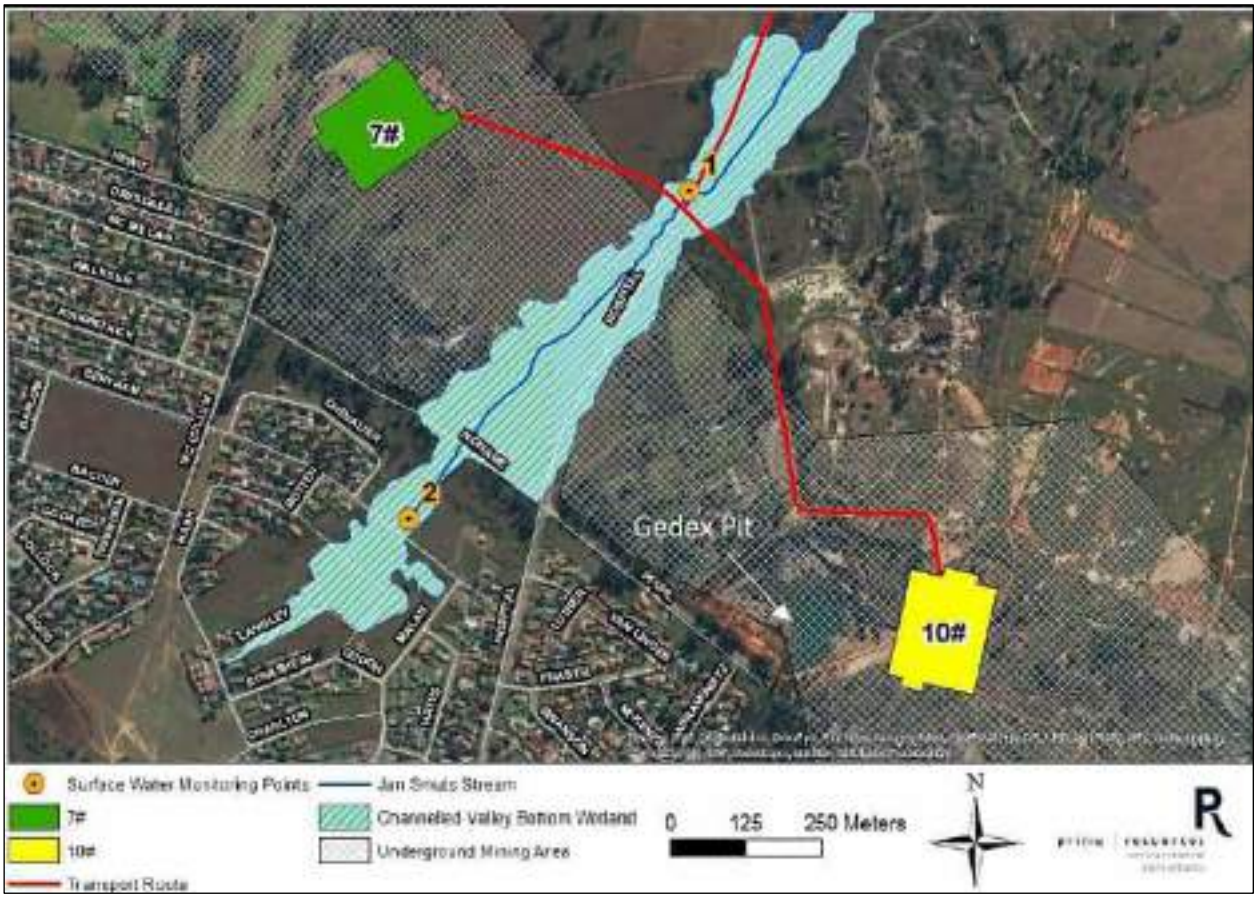

Figure 27. Surface water monitoring points

Table 21. Consolidated surface water quality results for the review period (adapted from GW2: Annual Report, 2025)

Surface site	Date	Analyte																								
		pH	EC (mS/m)	TDS (mg/l)	Ca (mg/l)	Mg (mg/l)	Na (mg/l)	K (mg/l)	Cl (mg/l)	SO_4 (mg/l)	Suspended Solids (mg/l)	TON (mg/l)	PO_4 (mg/l)	NH_4 (mg/l)	DO (mg/l)	COD (mg/l)	T-Alk (mg/l)	F (mg/l)	Al (mg/l)	As (mg/l)	CN (mg/l)	Cr (mg/l)	Co (mg/l)	Cu (mg/l)	Fe (mg/l)	Pb (mg/l)	Mn (mg/l)	Ni (mg/l)
GSW-1 (down-stream)	*Nov-23*	7.80	86.6	534.00	45.00	23.00	67.00	37.00	114.0	<2.00	15.60	-	**3.40**	-	-	*60*	248.0	0.30	<0.10	-	-	-	-	<0.010	*0.85*	-	**1.40**	-
	Nov-23	7.58	70.3	374.84	38.10	19.00	60.30	23.70	80.60	15.00	*26.80*	1.290	**2.18**	<0.45	**6.14**	*65*	209.0	0.11	<0.01	<0.009	<0.01	<0.01	<0.01	<0.010	*0.12*	<0.01	0.10	<0.01
	Jan-24	7.58	60.9	320.74	38.10	15.20	56.30	8.55	65.50	21.90	*160.0*	<0.35	**1.61**	<0.45	6.79	*32*	183.0	*0.40*	<0.01	<0.009	<0.01	<0.01	<0.01	<0.010	0.03	<0.01	0.02	<0.01
	Jan-24	7.59	51.3	288.67	32.70	13.10	52.80	2.03	59.20	41.80	*52.40*	1.010	**0.63**	<0.45	6.76	*32*	134.0	0.20	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.03	<0.01
	Feb-24	7.20	43.3	234.04	27.27	10.96	41.34	3.22	53.71	27.85	*26.80*	0.390	**1.15**	<0.45	**5.67**	*35*	106.9	0.15	<0.01	<0.01	<0.01	<0.01	<0.01	*0.04*	*0.15*	<0.01	0.03	<0.01
	Mar-24	**5.95**	37.5	199.04	22.70	9.60	34.60	1.87	46.60	33.40	*28.40*	<0.35	**0.51**	-	6.59	-	80.8	0.17	<0.01	<0.009	<0.01	-	-	*0.03*	0.05	-	<0.01	<0.01
	Apr-24	7.60	41.8	217.93	24.50	10.99	35.60	3.45	50.00	44.30	*63.20*	<0.35	**0.33**	-	6.84	-	79.7	0.24	<0.01	<0.009	-	-	-	<0.01	0.02	-	<0.01	<0.01
	May-24	7.67	46.3	243.11	29.70	11.00	40.40	5.70	57.10	49.00	*50.00*	<0.35	-	-	6.50	-	83.4	0.16	<0.01	<0.009	-	-	-	*0.01*	0.01	-	<0.01	<0.01
	Jun-24	7.52	63.5	303.38	34.80	14.50	49.80	11.80	61.00	28.10	*131.0*	0.430	-	-	**2.80**	-	169.0	-	<0.01	<0.009	-	-	-	*0.03*	0.05	-	0.03	<0.01
	Jul-24	7.52	65.0	283.50	31.60	11.63	50.70	12.09	61.20	25.60	17.60	<0.35	-	-	**4.30**	-	151.0	-	<0.01	<0.009	-	-	-	-	0.06	-	0.02	<0.01
	Aug-24	7.75	62.3	350.91	31.40	15.20	54.50	23.90	76.52	73.02	*46.80*	2.260	**0.88**	<0.45	**6.17**	-	106.0	-	<0.01	<0.009	-	-	-	<0.01	0.02	-	0.04	<0.01
	Sept-24	**6.28**	63.2	364.32	34.00	16.54	56.08	27.78	76.80	79.16	10.80	1.610	-	-	6.55	-	111.0	-	<0.01	<0.009	-	<0.01	<0.01	-	0.02	<0.01	<0.01	<0.01
	Oct-24	7.22	68.3	382.40	41.29	16.71	55.79	33.63	81.20	21.59	*171.0*	<0.35	**4.52**	-	**6.45**	-	194.2	-	<0.01	<0.009	-	-	-	<0.01	*0.64*	-	**1.15**	<0.01
	Nov-24	7.13	64.1	340.46	35.14	15.33	49.30	27.74	67.90	13.70	8.80	5.170	-	-	**4.48**	-	180.0	*0.34*	<0.01	<0.009	-	-	-	<0.01	0.09	-	0.01	<0.01
	Dec-24	7.34	74.9	425.80	40.70	18.70	77.47	36.87	87.20	26.50	12.80	1.330	-	-	**6.38**	-	219.0	*0.32*	<0.01	<0.009	-	-	-	<0.01	*0.25*	-	**0.50**	<0.01
	Jan-25	7.63	36.7	207.02	27.00	11.00	28.70	2.14	34.90	25.75	11.60	4.712	-	-	**5.87**	-	94.4	-	<0.01	<0.009	-	-	-	*0.01*	0.02	-	<0.01	<0.01
	Feb-25	7.41	36.9	197.08	28.00	9.24	30.30	1.24	34.60	43.10	*149.0*	0.800	-	-	**5.63**	-	78.4	-	<0.01	<0.009	-	-	-	<0.01	<0.01	-	0.02	<0.01
	Mar-25	7.37	30.3	184.46	24.90	9.48	25.50	0.45	32.10	51.10	*112.0*	<0.35	-	-	**5.61**	-	68.2	-	<0.01	<0.009	-	-	-	*0.03*	<0.01	-	0.01	<0.01
	Apr-25	**6.02**	44.4	257.82	33.80	13.90	32.60	1.17	42.80	85.50	*39.60*	0.850	-	-	**6.28**	-	73.8	-	<0.01	<0.009	-	-	-	<0.01	<0.01	-	<0.01	<0.01
	May-25	8.05	48.6	271.11	33.41	13.78	37.88	2.54	51.00	76.00	1.20	1.740	-	-	7.51	-	81.2	-	<0.01	<0.009	-	-	-	*0.01*	0.04	-	<0.01	0.02
	Jun-25	**6.04**	60.8	348.44	38.50	18.00	51.60	6.81	67.00	91.60	4.40	4.750	-	-	7.95	-	89.6	0.13	<0.01	<0.009	-	-	-	<0.01	<0.01	-	<0.01	<0.01
	Jul-25	7.64	73.1	431.26	44.40	22.00	59.00	16.90	76.00	135.0	*40.00*	5.660	-	-	8.11	-	88.0	-	<0.01	-	<0.01	-	-	-	0.09	-	<0.01	-
	Aug-25	**6.44**	79.2	481.13	43.20	23.00	72.70	26.00	90.30	137.0	*62.80*	3.410	-	-	**5.75**	-	123.0	-	<0.01	-	<0.01	-	-	-	0.02	-	<0.01	-
	Sept-25	7.53	84.6	506.59	46.50	29.50	71.60	37.10	101.0	111.0	*26.00*	0.660	**0.95**	<0.45	6.72	-	173.0	0.25	<0.01	-	<0.01	-	-	-	<0.01	-	<0.01	-
GSW-2 (up-stream)	*Nov-23*	7.70	89.1	544.00	49.00	26.00	73.00	42.00	117.00	<2.00	6.70	-	**4.80**	-	-	*64*	252.00	0.30	<0.10	-	-	-	-	<0.010	*0.38*	-	**1.76**	-
	Nov-23	7.34	70.6	373.54	38.70	18.90	57.20	23.00	75.55	38.60	*54.00*	3.01	**3.22**	<0.45	6.53	*60*	163.60	0.12	<0.01	<0.009	<0.01	<0.01	<0.01	*0.02*	0.05	<0.01	0.04	<0.01
	Jan-24	7.46	57.6	301.70	38.00	13.90	53.20	3.41	62.30	33.70	*45.20*	<0.35	**0.59**	0.65	**5.47**	*51*	157.00	*0.32*	<0.01	<0.009	<0.01	<0.01	<0.01	*0.02*	0.02	<0.01	<0.01	<0.01
	Jan-24	7.34	50.1	273.79	30.70	12.80	51.30	0.80	60.50	47.60	4.80	0.75	**0.19**	<0.45	**6.19**	*23*	110.00	0.17	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.01	<0.01
	Feb-24	7.06	42.6	224.60	23.38	9.77	40.30	1.85	56.50	40.77	2.80	<0.35	**0.27**	*1.92*	**4.94**	*33*	80.84	0.16	<0.01	<0.01	<0.01	<0.01	<0.01	*0.04*	0.04	<0.01	0.02	<0.01
	Mar-24	**6.02**	36.0	189.78	21.40	8.40	34.50	1.28	45.80	36.20	2.00	<0.35	**0.11**	-	6.31	-	69.46	0.17	<0.01	<0.009	<0.01	-	-	*0.02*	0.02	-	<0.01	<0.01
	Apr-24	7.40	42.1	213.67	24.10	10.90	36.10	3.19	50.40	43.60	12.40	<0.35	0.07	-	6.85	-	74.89	0.23	<0.01	<0.009	-	-	-	<0.01	<0.01	-	<0.01	<0.01
	May-24	7.34	46.8	239.82	28.40	11.00	40.60	6.84	58.00	47.90	*392.0*	0.46	-	-	**4.49**	-	74.00	0.21	<0.01	<0.009	-	-	-	*0.01*	<0.01	-	*0.43*	<0.01
	Jun-24	7.45	52.5	283.70	29.60	12.00	43.00	9.15	68.40	66.60	4.00	4.84	-	-	7.40	-	55.80	-	<0.01	<0.009	-	-	-	*0.01*	0.03	-	<0.01	<0.01
	Jul-24	7.37	58.7	306.95	31.50	11.50	49.00	12.90	77.50	66.30	*596.0*	4.61	-	-	**2.81**	-	63.00	-	<0.01	<0.009	-	-	-	*0.02*	<0.01	-	0.03	<0.01
	Aug-24	7.62	69.0	367.48	29.80	11.90	59.50	14.80	66.30	19.30	14.40	0.35	**2.21**	*20.60*	**3.95**	-	218.00	-	<0.01	<0.009	-	-	-	*0.04*	0.06	-	*0.11*	<0.01
	Sept-24	**6.36**	57.8	351.68	30.80	11.80	65.40	13.80	63.40	30.30	2.00	13.50	-	-	**3.90**	-	127.00	-	<0.01	<0.009	-	<0.01	<0.01	<0.01	0.03	<0.01	0.03	<0.01
	Oct-24	7.33	65.6	352.87	36.62	12.65	58.72	17.60	65.90	25.97	5.00	9.40	**2.14**	-	**6.39**	-	145.00	-	<0.01	<0.009	-	-	-	<0.01	0.11	-	0.09	<0.01
	Nov-24	7.09	64.0	300.13	30.92	12.59	53.36	13.96	27.30	62.20	*36.00*	<0.35	-	-	**4.89**	-	166.00	0.19	<0.01	<0.009	-	-	-	<0.01	<0.01	-	<0.01	<0.01
	Dec-24	7.18	67.1	391.00	39.80	14.90	68.70	19.70	59.10	91.80	6.00	0.56	-	-	**6.41**	-	157.00	0.24	<0.01	<0.009	-	-	-	<0.01	0.02	-	0.06	<0.01
	Jan-25	7.43	34.1	182.36	25.40	9.35	25.50	4.36	30.40	23.20	4.40	1.07	-	-	**5.89**	-	99.00	-	<0.01	<0.009	-	-	-	*0.02*	0.01	-	<0.01	<0.01
	Feb-25	7.35	29.5	158.15	23.70	8.04	20.60	4.87	23.60	29.20	7.20	0.60	-	-	6.73	-	75.80	-	<0.01	<0.009	-	-	-	*0.03*	<0.01	-	<0.01	<0.01

Surface site	Date	Analyte																								
		pH	EC (mS/m)	TDS (mg/l)	Ca (mg/l)	Mg (mg/l)	Na (mg/l)	K (mg/l)	Cl (mg/l)	SO_4 (mg/l)	Suspended Solids (mg/l)	TON (mg/l)	PO_4 (mg/l)	NH_4 (mg/l)	DO (mg/l)	COD (mg/l)	T-Alk (mg/l)	F (mg/l)	Al (mg/l)	As (mg/l)	CN (mg/l)	Cr (mg/l)	Co (mg/l)	Cu (mg/l)	Fe (mg/l)	Pb (mg/l)	Mn (mg/l)	Ni (mg/l)
	Mar-25	7.28	30.3	156.11	23.90	8.35	19.50	3.43	23.00	33.60	2.40	<0.35	-	-	**6.19**	-	73.80	-	<0.01	<0.009	-	-	-	*0.02*	0.04	-	<0.01	<0.01
	Apr-25	6.53	38.1	207.75	31.00	10.20	25.10	4.73	32.90	49.70	8.80	<0.35	-	-	7.34	-	90.20	-	<0.01	<0.009	-	-	-	<0.01	<0.01	-	<0.01	<0.01
	May-25	7.88	43.6	241.22	29.76	11.34	35.16	5.92	42.20	57.30	1.20	0.54	-	-	7.05	-	95.20	-	<0.01	<0.009	-	-	-	<0.01	0.02	-	<0.01	0.01
	Jun-25	**6.41**	58.2	338.70	38.50	17.60	50.90	6.45	66.20	94.20	2.40	3.42	-	-	8.02	-	82.60	0.12	<0.01	<0.009	-	-	-	<0.01	0.02	-	<0.01	<0.01
	Jul-25	7.71	51.6	284.90	31.50	13.30	45.80	10.70	52.50	67.50	<0.4	<0.35	-	-	8.06	-	106.00	-	<0.01	-	<0.01	-	-	-	<0.01	-	<0.01	-
	Aug-25	7.06	50.8	297.10	31.40	13.30	51.30	13.90	57.10	59.30	8.80	<0.35	-	-	7.91	-	118.00	-	<0.01	-	<0.01	-	-	-	<0.01	-	<0.01	-
	Sept-25	7.77	55.8	310.16	31.40	15.00	59.90	12.30	62.60	34.50	4.80	<0.35	0.61	<0.45	7.21	-	154.00	0.19	<0.01	-	<0.01	-	-	-	<0.01	-	<0.01	-
Gedex Pit	*Aug-24*	7.45	47.40	275.22	38.80	25.80	17.20	6.63	34.30	62.70	2.40	<0.35	0.06	<0.45	-	-	149.00	0.20	<0.01	<0.009	<0.01	<0.01	<0.01	**0.01**	<0.01	<0.01	<0.01	<0.01

Values highlighted in orange exceeded guidelines / limits as per Table 19
Values highlighted in red exceeded guidelines / limits as per Table 20

6.7.2 Groundwater

6.7.2.1 External groundwater users

The WUL requires the annual re-sampling of the privately owned boreholes identified during the 2017 hydrocensus, namely GBH-1, GBH-3, GBH-7 and GBH-8. The external user boreholes were first revisited in January 2024; however, due to access constraints, only GBH-1 and GBH-2 were sampled. These boreholes were re-sampled in August 2024. The supply borehole at the Golan Shooting Range (GBH-10), situated west of the Gedex Pit, was sampled in August, September and December 2024, after which it dried up. Potable trucked water has subsequently been supplied and monitored under reference GBH-10DW. Boreholes GBH-3 to GBH-8 remained inaccessible for the audit review period. The locations of the external user boreholes are shown in Figure 28.

DO has historically exceeded the NKGM WUL limit at GBH-1, GBH-2 and GBH-10. Except for elevated nitrate concentrations, the analysed parameters generally complied with SANS 241-1: 2015. However, in September 2024, SO_4 concentrations in GBH-10 exceeded the SANS aesthetic limit of 250 mg/l. During the same sampling round, NH_4 exceeded the aesthetic limit of 1.5 mg/l, and Mn exceeded the chronic health limit of 0.4 mg/l. In December 2024, SO_4 concentrations remained elevated at similar levels. Manganese again exceeded the applicable limit, and nickel exceeded the chronic health limit. The trucked drinking water subsequently supplied to the neighbouring Shooting Range was confirmed to be potable.

Hydrochemical assessment indicates that GBH-1 and GBH-3 are characterised by a magnesium-bicarbonate water type, whereas GBH-2 and GBH-10 exhibit a magnesium-sulphate character. Borehole GBH-10 transitioned from a magnesium-bicarbonate signature (initial bailed sample) to a magnesium-sulphate signature following pump installation and subsequent pumped sampling.

Apart from borehole GBH-10 having dried up, no other unexpected quality or quantity issues / concerns were noted in terms of the external groundwater users.

Refer to Table 22 for the consolidated groundwater monitoring results of external boreholes.

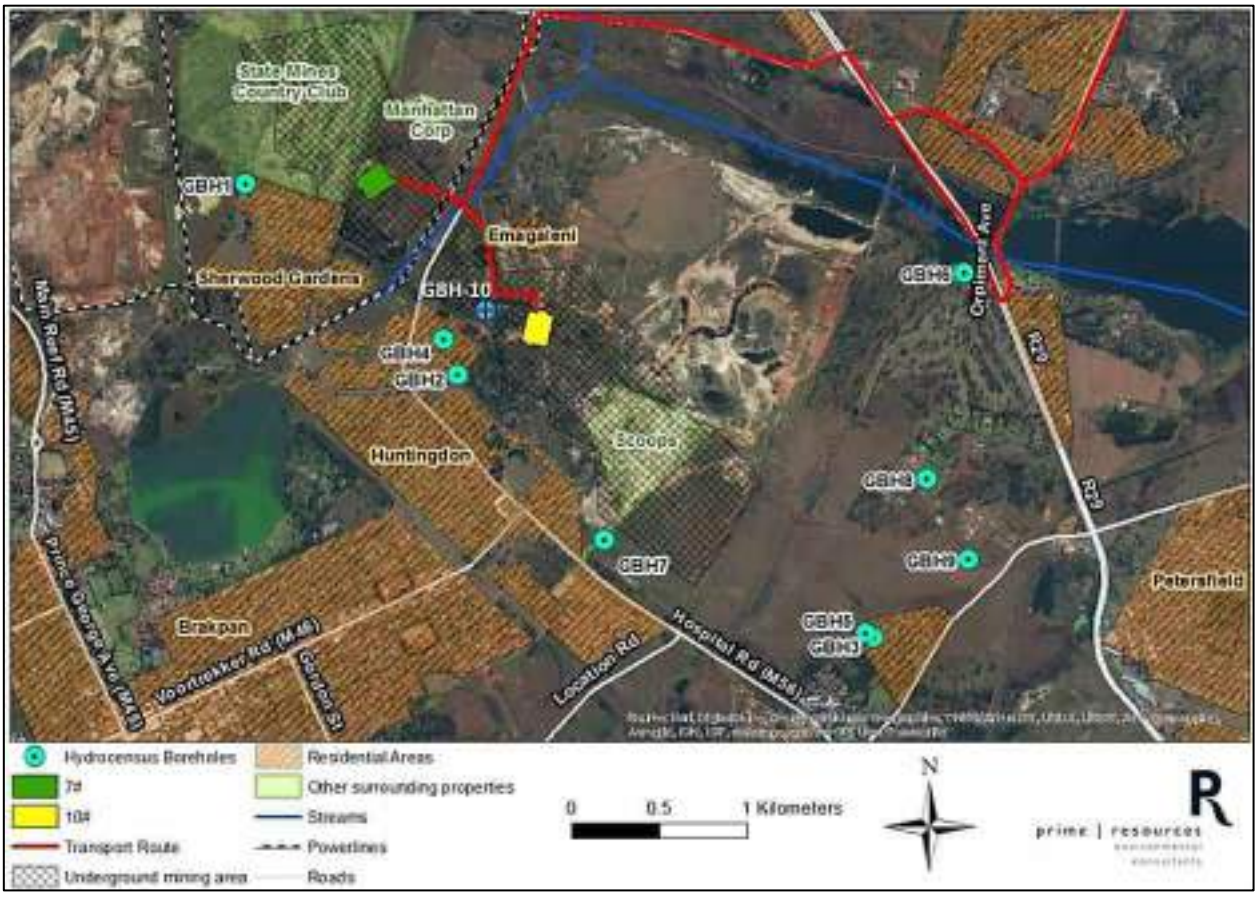

Figure 28. External groundwater users' borehole localities

Table 22. Groundwater monitoring results of external boreholes

Borehole ID	Date	pH	EC (mS/m)	TDS (mg/l)	Ca (mg/l)	Mg (mg/l)	Na (mg/l)	K (mg/l)	Cl (mg/l)	SO_4 (mg/l)	Suspended solids (mg/l)	TON (mg/l)	PO_4 (mg/l)	NH_4 (mg/l)	DO (mg/l)	COD (mg/l)	T.Alk (mg/l)	F (mg/l)	Al (mg/l)	As (mg/l)	CN (mg/l)	Cr (mg/l)	Co (mg/l)	Cu (mg/l)	Fe (mg/l)	Pb (mg/l)	Mn (mg/l)	Ni (mg/l)
GBH-1	*Oct-17*	6.96	43.90	239.11	33.32	22.32	12.48	5.29	26.98	42.63	<0.4	-	0.07	<0.45	7.03	3.00	114.00	0.13	<0.01	<0.005	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.03
	Jan-24	7.07	45.00	241.90	37.50	20.10	11.70	4.35	31.50	36.10	<0.4	9.31	<0.03	<0.45	**6.34**	38.00	98.90	<0.09	<0.01	<0.009	<0.01	<0.01	<0.01	<0.01	0.06	<0.01	<0.01	0.01
	Aug-24	7.24	41.80	239.81	31.80	20.50	13.30	5.52	32.40	24.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Jun-25	7.06	42.60	243.42	34.80	23.30	10.00	8.29	34.80	34.00	-	**10.00**	<0.03	<0.45	-	-	89.80	<0.09	<0.01	-	<0.01	-	<0.01	-	0.05	-	<0.01	<0.01
GBH-2	*Oct-17*	6.64	31.30	169.99	17.88	17.42	10.60	3.82	29.01	28.08	<0.4	-	0.05	<0.45	7.91	3.00	53.00	0.10	<0.01	<0.005	<0.01	<0.01	<0.01	<0.01	0.02	<0.01	0.01	0.01
	Jan-24	7.06	32.10	172.37	20.00	16.09	12.61	4.30	30.50	32.80	<0.4	5.30	<0.03	<0.45	**6.29**	11.00	54.30	<0.09	<0.01	<0.009	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.01
	Aug-24	7.25	30.40	173.86	20.00	17.30	10.40	4.01	32.90	22.10	-	-	-	-	-	-	-	-	-	-	<0.01	-	<0.01	-	-	-	-	-
	Jun-25	6.97	31.10	184.07	21.40	19.60	10.00	6.61	35.60	30.90	-	5.76	<0.03	<0.45	-	-	57.40	<0.09	<0.01	-	<0.01	-	<0.01	-	<0.01	-	<0.01	<0.01
GBH-3	*Oct-17*	7.56	60.50	325.99	51.89	34.57	13.29	3.72	46.22	59.64	<0.4	-	0.09	<0.45	7.18	3.00	176.00	<0.09	<0.01	<0.005	<0.01	<0.01	<0.01	<0.010	<0.01	<0.01	<0.01	<0.01
GBH-10	*Aug-24*	6.85	81.10	511.21	75.10	53.80	13.00	5.40	35.40	162.35	-	6.29	<0.03	<0.45	-	-	230.33	<0.09	<0.01	-	<0.01	-	<0.01	-	<0.01	-	0.10	<0.01
	Sept-24	7.83	93.90	634.59	101.80	53.22	23.30	8.40	33.70	**285.29**	11.60	0.66	<0.03	**4.37**	6.75	44.00	199.00	<0.09	<0.01	<0.009	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	**0.89**	0.02
	Dec-24	6.92	91.60	631.02	103.00	56.20	27.90	8.34	32.50	**285.00**	4.40	<0.35	-	-	**6.29**	-	196.00	0.19	<0.01	<0.009	-	-	-	0.02	0.02	-	**0.12**	**0.15**
GBH-10DW	*Jun-25*	7.17	21.00	120.15	18.60	7.93	10.00	5.68	17.00	15.50	0.78	<0.03	<0.45	-	-	-	69.80	0.10	<0.01	-	<0.01	-	<0.01	-	<0.01	-	<0.01	<0.01
	Sept-25	7.86	20.70	123.50	16.60	8.38	13.60	5.40	15.70	13.69	20.80	0.64	<0.03	<0.45	7.27	-	78.60	0.13	<0.01	-	<0.01	-	-	-	<0.01	-	<0.01	-

Values highlighted in orange exceeded guidelines / limits as per Table 19

6.7.2.2 Monitoring boreholes

The groundwater monitoring network comprises six groundwater monitoring boreholes. These boreholes were drilled in January 2025 following a delay of more than 18 months due to surface rights disputes. The locations of the newly commissioned monitoring boreholes, together with two existing boreholes (NSBH7 and NSBH8) previously utilised as water supply boreholes, are illustrated in Figure 29.

At 7#, the upgradient borehole NSBH6 was compliant for all analysed variables, except for selenium in February 2025 and Mn in April and June 2025, which exceeded the SANS 241-1: 2015 chronic health limits. The September 2025 Mn concentration exceeded only the aesthetic limit. The downgradient borehole, NSBH1, exceeded the aesthetic limit for Fe in April and September 2025, and for Mn in February and April 2025.

At the south-eastern extent of the project area, borehole NSBH3, located adjacent to the historical DRD waste rock dump (WRD), exceeded the NKGM WUL limits for Ca (April, June and September 2025) and for Mg and SO_4 (February, April, June and September 2025). Mg and SO_4 concentrations also exceeded the respective SANS 241-1: 2015 acute and chronic health limits. EC and TDS exceeded aesthetic limits in April, June and September 2025, while NH_4 exceeded the aesthetic limit in June and September 2025. Its upgradient counterpart, NSBH4, exceeded the chronic health limit for Mn in February, April, June and September 2025, and the aesthetic limit for Fe in the last three sampling rounds.

At 10#, borehole NSBH5, located adjacent to the Gedex Pit, was compliant for all analysed variables, except for aesthetic exceedances of Fe and Mn in April 2025 and an aluminium (Al) operational limit exceedance in September 2025. The downgradient borehole NSBH2, located at the former Government Gold Mining Areas settling ponds, exceeded the NKGM WUL limits for Ca, Mg, and SO_4 in all recorded samples. EC and TDS consistently exceeded the SANS 241-1: 2015 aesthetic limits, and SO_4 exceeded the acute health limit. Mn exceeded the chronic health limit in February and late June 2025. Borehole NSBH8, situated approximately 200 m south-west along the perimeter fence, exhibited similar macro-parameter exceedances to NSBH2, with additional exceedances of Mn (aesthetic, February 2025), and F, Fe, Mn (chronic health) and Al (operational) in April 2025. The NKGM WUL DO limit was exceeded in September 2025. In contrast, NSBH7, located approximately 250 m south-east of NSBH5, exceeded only the aesthetic limit for Mn in February, April and June 2025.

Hydrochemical interpretation indicates that NSBH1, NSBH4 and NSBH5 consistently display a magnesium-bicarbonate water type, which is generally indicative of less impacted groundwater conditions. NSBH2, NSBH3, NSBH7 and NSBH8 are characterised by a magnesium-sulphate signature, which may indicate influence from mine-affected water and is consistent with the broader historical groundwater quality context of the site. NSBH6 exhibits mixed magnesium-bicarbonate and magnesium-sulphate characteristics, suggesting transitional or mixed hydrochemical influences.

Refer to Table 23 for the consolidated groundwater monitoring results for the review period.

Figure 29. Monitoring borehole localities

Table 23. Groundwater monitoring results of monitoring boreholes (adapted from GW2: Annual Report, 2025)

Borehole ID	Date	pH	EC (mS/m)	TDS (mg/l)	Ca (mg/l)	Mg (mg/l)	Na (mg/l)	K (mg/l)	Cl (mg/l)	SO_4 (mg/l)	SS (mg/l)	TON (mg/l)	PO_4 (mg/l)	NH_4 (mg/l)	DO (mg/l)	COD (mg/l)	T-Alk (mg/l)	F (mg/l)	Al (mg/l)	Hg (mg/l)	CN (mg/l)	Si (mg/l)	Co (mg/l)	Se (mg/l)	Fe (mg/l)	Phenols (mg/l)	Mn (mg/l)	Ni (mg/l)
NSBH1	*Feb-25*	7.70	57.80	355.46	47.60	39.03	14.26	4.74	17.37	107.97	-	1.35	<0.03	<0.45	-	-	196.80	<0.09	<0.01	<0.003	0.01	3.20	<0.01	<0.01	0.08	<0.01	0.34	-
	Apr-25	7.26	57.00	336.28	46.40	37.50	12.80	4.77	19.10	96.40	-	<0.35	-	-	-	-	198.00	<0.09	<0.01	-	-	4.09	-	-	**0.32**	-	0.19	-
	Jun-25	6.76	55.80	331.11	51.80	38.70	10.00	2.38	20.30	91.40	-	<0.35	<0.03	<0.45	-	-	194.00	<0.09	<0.01	<0.003	<0.01	4.14	<0.01	<0.01	0.07	<0.01	0.06	-
	Sep-25	7.60	57.70	369.73	52.90	45.10	13.60	3.99	21.10	95.10	337.00	**<0.35**	<0.03	<0.45	6.84	-	229.00	0.09	<0.01	-	<0.01	5.12	-	-	**0.45**	-	<0.01	-
NSBH2	*Feb-25*	7.13	**238.00**	**1756.67**	**264.87**	**140.00**	95.40	12.70	62.71	**1018.00**	-	**7.37**	<0.03	<0.45	-	-	214.00	<0.09	<0.01	<0.003	<0.01	16.00	0.02	<0.01	0.01	<0.01	**1.85**	0.07
	Apr-25	6.90	**253.00**	**2162.29**	**339.38**	**155.00**	91.70	14.10	56.80	**1337.66**	-	**10.20**	-	-	-	-	204.00	<0.09	<0.01	-	-	18.26	-	-	<0.01	-	0.06	-
	Jun-25	7.67	**254.00**	**2206.09**	**270.36**	**169.00**	151.00	15.80	83.50	**1380.00**	**932.00**	2.60	<0.03	<0.45	7.78	218.00	208.00	<0.09	<0.01	-	<0.01	12.10	0.03	-	0.06	-	**0.02**	<0.01
	Jun-25	6.53	**226.00**	**1938.65**	**258.00**	**138.00**	122.00	9.05	73.60	**1191.00**	-	3.21	<0.03	<0.45	-	-	220.00	<0.09	<0.01	<0.003	<0.01	13.30	<0.01	<0.01	<0.01	<0.01	**0.78**	<0.01
	Sep-25	7.33	**185.00**	**1391.61**	**175.00**	**107.00**	113.00	7.61	77.40	**791.00**	13.20	<0.35	<0.03	<0.45	7.15	-	201.00	<0.09	<0.01	-	<0.01	11.50	-	-	<0.01	-	<0.01	-
NSBH3	*Feb-25*	7.36	153.00	1035.06	149.00	**97.30**	40.70	9.21	36.40	**591.00**	-	3.46	<0.03	1.07	-	-	155.00	<0.09	<0.01	<0.003	0.01	5.86	0.03	<0.01	0.08	<0.01	**1.61**	0.01
	Apr-25	6.78	257.00	2263.58	**288.49**	**170.00**	105.00	13.50	53.40	**1590.00**	-	<0.35	-	-	-	-	53.20	<0.09	<0.01	-	-	4.33	-	-	0.07	-	**11.20**	-
	Jun-25	6.35	325.00	3129.19	**387.00**	**233.00**	177.00	11.10	70.00	**2105.00**	-	<0.35	<0.03	**6.21**	-	-	209.00	<0.09	<0.01	<0.003	<0.01	5.45	<0.01	<0.01	0.08	<0.01	**12.60**	<0.01
	Sept-25	6.93	265.00	2440.08	**279.00**	**200.00**	141.00	12.30	61.70	**1585.00**	**199.00**	<0.35	<0.03	**4.25**	6.64	-	246.00	<0.09	<0.01	-	<0.01	4.49	-	-	0.09	-	**7.91**	-
NSBH4	*Feb-25*	7.37	48.00	277.04	38.20	27.90	14.20	7.02	25.00	77.90	-	<0.35	<0.03	<0.45	-	-	143.00	<0.09	<0.01	<0.003	0.07	8.75	0.04	<0.01	0.10	<0.01	**0.81**	<0.01
	Apr-25	7.00	43.80	238.60	33.10	22.00	13.30	6.73	26.00	66.90	-	<0.35	-	-	-	-	117.00	<0.09	<0.01	-	-	6.85	-	-	**0.37**	-	<0.01	-
	Jun-25	6.81	44.30	245.12	33.90	27.10	10.00	5.90	25.00	54.40	-	<0.35	<0.03	<0.45	-	-	146.00	<0.09	<0.01	<0.003	<0.01	10.40	<0.01	<0.01	**0.53**	<0.01	**0.69**	<0.01
	Sep-25	7.16	45.60	257.62	33.90	28.60	16.70	7.52	27.50	50.60	**1646.00**	<0.35	<0.03	<0.45	6.65	-	151.20	<0.09	<0.01	-	<0.01	9.12	-	-	**0.88**	-	**1.20**	-
NSBH5	*Feb-25*	7.27	40.30	226.57	33.60	22.60	10.20	4.77	21.20	38.20	-	3.60	<0.03	<0.45	-	-	133.00	<0.09	<0.01	<0.003	0.06	16.50	<0.01	<0.01	0.09	<0.01	0.10	<0.01
	Apr-25	7.15	38.30	206.03	32.00	20.90	9.09	4.94	21.40	29.20	-	3.17	-	-	-	-	123.00	<0.09	0.17	-	-	18.40	-	-	**0.36**	-	**0.13**	-
	Jun-25	6.86	38.00	218.13	32.40	23.00	10.00	3.99	24.20	32.90	-	2.79	<0.03	<0.45	-	-	132.00	<0.09	<0.01	<0.003	<0.01	17.40	<0.01	<0.01	0.08	<0.01	<0.01	<0.01
	Sep-25	7.34	41.90	260.63	36.30	28.20	12.00	5.29	25.40	42.70	**210.00**	3.06	<0.03	<0.45	7.19	-	161.00	<0.09	**0.32**	-	<0.01	18.10	-	-	0.26	-	<0.01	-
NSBH6	*Feb-25*	7.26	102.00	585.53	54.30	76.53	39.96	12.72	67.80	87.67	-	6.44	<0.03	<0.45	-	-	363.00	0.10	<0.01	<0.003	0.04	4.29	<0.01	**0.05**	0.01	<0.01	0.07	<0.01
	Apr-25	6.92	83.60	512.67	61.30	33.80	51.90	7.65	67.20	166.00	-	6.23	-	-	-	-	156.00	<0.09	<0.01	-	-	3.02	-	-	0.17	-	**3.45**	-
	Jun-25	6.91	66.20	402.28	52.10	35.40	29.50	3.97	49.70	119.00	-	3.10	<0.03	<0.45	-	-	163.00	<0.09	<0.01	<0.003	<0.01	2.36	<0.01	-	0.05	<0.01	**1.03**	<0.01
	Sep-25	7.31	78.00	473.12	65.90	50.30	32.90	6.33	50.30	118.00	**2366.00**	1.92	<0.03	<0.45	6.26	-	234.00	<0.09	<0.01	-	<0.01	2.49	-	-	0.25	-	**0.23**	-
NSBH7	*Feb-25*	7.48	54.90	345.52	46.10	35.40	12.19	8.46	21.80	134.09	-	<0.35	0.06	<0.45	-	-	145.20	<0.09	<0.01	<0.003	0.03	6.18	<0.01	0.03	<0.01	<0.01	**0.14**	0.01
	Apr-25	7.64	52.50	320.12	45.10	32.70	9.55	7.26	22.20	117.00	-	<0.35	-	-	-	-	143.00	<0.09	0.06	-	-	6.27	-	-	0.08	-	**0.37**	-
	Jun-25	7.46	50.60	325.83	45.30	34.40	10.00	6.51	22.30	117.00	-	<0.35	<0.03	<0.45	-	-	150.00	<0.09	<0.01	<0.003	<0.01	5.66	<0.01	-	0.04	<0.01	**0.28**	<0.01
	Sep-25	7.67	50.40	316.24	43.20	38.00	11.90	7.21	21.30	105.00	**295.00**	<0.35	<0.03	<0.45	6.92	-	149.00	0.10	0.07	-	<0.01	7.58	-	-	0.03	-	0.03	-
NSBH8	*Feb-25*	7.36	**228.00**	**1662.19**	**229.00**	**140.00**	97.30	11.20	65.30	**1003.00**	-	7.74	0.05	<0.45	-	-	136.00	<0.09	<0.01	<0.003	0.04	13.10	0.01	<0.01	0.02	<0.01	0.26	0.02
	Apr-25	3.92	**288.00**	**2932.35**	**375.79**	**153.00**	92.50	**21.60**	65.30	**1994.00**	-	1.28	-	-	-	-	0.00	**46.80**	**8.13**	-	-	22.00	-	-	**156.36**	-	**13.20**	-
	Jun-25	7.05	**210.00**	**1778.29**	**253.00**	**133.00**	99.60	10.40	73.00	**1094.00**	-	6.78	<0.03	<0.45	-	-	142.00	<0.09	<0.01	<0.003	<0.01	15.00	<0.01	<0.01	<0.01	<0.01	0.05	<0.01
	Sep-25	7.38	**228.00**	**1964.37**	**265.00**	**149.00**	103.00	12.50	77.50	**1241.00**	**376.00**	5.54	<0.03	<0.45	**6.14**	-	153.00	<0.09	<0.01	-	<0.01	15.40	-	-	0.03	-	<0.01	-

Values highlighted in orange exceeded guidelines / limits as per Table 19

Groundwater levels have been monitored on a monthly basis since April 2025. The groundwater levels of monitoring boreholes are presented in Figure 30, recorded in meters below collar (mbc). Groundwater level trends are further illustrated in Figure 31.

Except for an initial rise in groundwater levels at NSBH6 between February and April 2025, water levels across the monitoring network have remained generally stable. Borehole NSBH2 has been repurposed as a production borehole, and access for continued water level monitoring has not been available since June 2025. Borehole NSBH8, commissioned in December 2024, did not intersect the anticipated target within the old workings, although it reportedly penetrated historical stopes approximately 16 m off target at a depth of approximately 200 m below surface. The recorded water levels at NSBH8 differ markedly from those observed in the remaining monitoring boreholes.

Apart from the repurposing of NSBH2, no unexpected groundwater quality or quantity concerns were identified within the actively monitored boreholes. The results continue to reflect historical impacts associated with the Old Government Mines Settling Pond area downgradient of 10#, as well as the DRD WRD located at the south-eastern extent of the project area.

Figure 30. Groundwater levels of monitoring boreholes (mbc)

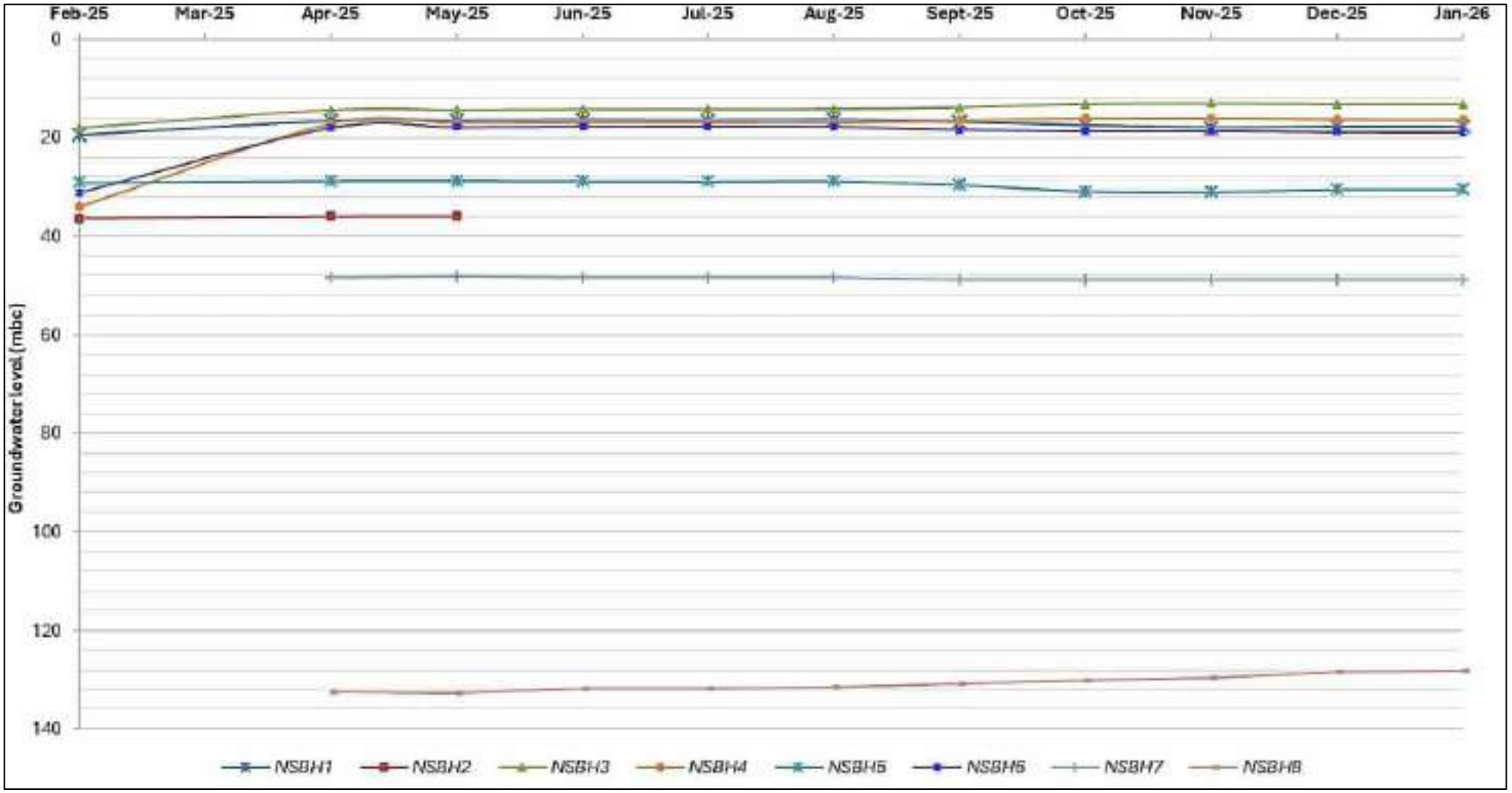

Figure 31. Groundwater level trends of monitoring boreholes

7 FINANCIAL PROVISION

The latest annual revision of the financial provision (FP) was undertaken by Prime Resources in March 2026, in line with the requirements of the NEMA Financial Provisioning Regulations (GN1147 of 2015).

In 2026, the total FP for the Cons Modder Mine for planned (Final) closure was calculated to be R 60 526 650.49. The FP is broken down as follows:

- Annual rehabilitation: R 0.00
- Final Rehabilitation, Decommissioning & Mine Closure Plan: R 55 138 860.61
- Environmental Risk Assessment Report: R 5 387 789.87

The total FP for 2025 and 2026 are summarised in Table 24. Adjustments to the 2025 FP included year-on-year Consumer Price Index (CPI) increases and additional provisions for new infrastructure and changes that were made on-site. Preliminary and Generals (P&Gs) (20 %) and Contingencies (5 %) are included, and VAT is excluded. The 2025 FP is compared with the current financial guarantee to determine the excess or shortfall.

Table 24. Comparison between current and previous FP and provision thereof (Prime Resources, 2026)

Provision	Estimated quantum (2025)	Estimated quantum (2026)	Value of the current financial guarantee	Excess (+) / shortfall (-)
Annual rehabilitation	R 0.00	R 0.00	R 51 287 810.70	- R 9 238 839.79
Final rehabilitation, decommissioning and mine closure plan	R 46 067 084.08	R 55 138 860.61		
Residual environmental impacts	R 5 220 726.62	R 5 387 789.87		
Total	**R 51 287 810.70**	**R 51 287 810.70**		

Newshelf has made FP to the total value of R 51 287 810.70 as per the Rehabilitation Guarantee (CQ/G/30386/1125/048) from Centriq Insurance Company Limited (confirmation date 27 November 2025).

There is thus a shortfall of R 9 238 839.79 in the available FP. Newshelf must increase the FP and provide proof of increasing the FP to the Minister responsible for mineral resources. This shortfall includes the FP required for the proposed amendments and associated infrastructure (R 9 238 839.79).

8 ADEQUACY OF THE EMPR

The EMPr remains largely effective in addressing the environmental aspects associated with the original authorised activities, and most operational controls required by the EMPr are implemented on site. Monitoring programmes for air quality, noise, blasting, aquatic biology, and water are in place, and no widespread or irreversible environmental degradation was observed during the audit. Most operational controls prescribed in the EMPr are being implemented.

However, the operational footprint has expanded from 6 ha to approximately 36 ha to accommodate the development and operation of the trackless decline portal and associated infrastructure. As a result, the current site layout and activities, and associated risks, differ from those assessed under the original EA.

While environmental management measures are being implemented, certain requirements in the existing EMPr do not fully reflect the current operational layout, infrastructure configuration and associated water uses. The adequacy of the EMPr is therefore partially constrained, as it was developed for a smaller project footprint.

In its current approved form, the EMPr is adequate for the originally authorised activities, but requires formal amendment to ensure full alignment with the expanded footprint and current operational context.

9 RECOMMENDATIONS AND ACTIONS

9.1 EMPr recommendations

Regulation 34 of the NEMA EIA Regulations (2014) requires the holder of the EA to submit recommendations to amend the EMPr or closure plan where findings of the EAR indicate:

- Insufficient mitigation of environmental impacts associated with the undertaking of activity
- Insufficient levels of compliance with the EA or EMPr.

Since the issuance of the original EA, the project footprint, infrastructure layout, and associated environmental management requirements have changed. These have resulted in spatial and operational deviations from the originally authorised layout.

To address this, Newshelf has initiated formal regulatory processes to align the expanded project footprint and infrastructure layout:

- A new EA application has been submitted to the DMPR through a combined Scoping and EIA process. A decision on this application is pending at the time of reporting.
- A WML application forms part of the full Scoping and EIA process and is currently under review by the DMPR.
- A Section 102 amendment application in terms of MPRDA has been submitted to align the approved MR with the expanded project footprint and infrastructure configuration.
- The EMPr submitted as part of the Scoping and EIA process has been updated to:
    - Remove measures that are no longer applicable or relevant
    - Incorporate additional mitigation measures where required due to footprint expansion or infrastructure changes.
- An application for a consolidated WUL is underway. The final WULA is to be submitted to the DWS in March / April 2026 (DWS ref. no.: WU30136)
- A public participation process has been conducted in accordance with the requirements of Chapter 6 of the NEMA EIA Regulations (2014).

It is therefore recommended that:

- The CA consider the pending application and associated updated EMPr to formally align the authorised layout with current operations.
- Once approved, the amended EMPr replace the existing EMPr in full to ensure that mitigation measures are aligned.
- Until such approval is granted, the mine continues implementing environmental management measures in accordance with:
    - The existing approved EMPr
    - The updated EMPr submitted as part of the amendment application, where these measures are more stringent or site-appropriate.

9.2 Other recommendations

Recommendations for improvements that can be made on-site include the following:

- **Regulatory alignment**
    - In addition to the recommendations as per Section 9.1, ensure that no further deviations from the approved project description, listed activities and authorised footprint occur prior to written approval by the competent authority (and implement any conditions imposed through the amendment decision).
- **Stormwater, erosion, and dirty water management (priority area)**
    - Clearly delineate and separate clean and dirty water areas in line with GN 704 requirements.
    - All bare or exposed soil surfaces (access roads, internal roads and working areas) are to be stabilised and capped to minimise erosion risk.
    - Implement the planned stormwater measures (e.g., sumps, culverts, etc.) as a priority, aligned to the current operational footprint and stockpiling areas.
    - Establish and document a stormwater inspection and maintenance schedule, with specific checks during / after heavy rainfall.
    - Apply progressive stabilisation and temporary erosion controls (e.g., diversion berms / contouring / surface stabilisation) in exposed disturbed areas to minimise soil loss.
- **Hydrocarbons, spill control, and soil protection**
    - Standardise all hydrocarbon / chemical storage and handling areas to include firm, impermeable, chemical-resistant flooring with adequate bunding / secondary containment.
    - Install drip trays beneath stationary equipment; repair / replace leaking IBCs and containers without delay.
    - Maintain a formal spill and clean-up register recording the date, location, substance, estimated volume, remedial actions, disposal actions (if any), and responsible person.
    - Upgrade waste storage areas to meet EA requirements: provide firm, impermeable, chemical-resistant flooring and roofing to prevent rainwater contact with waste, across all waste storage areas (including skips positioned on soil).
    - Conduct a formal risk assessment for underground hydrocarbon handling. Implement portable bunded platforms where required.
- **Compliance systems, records, and communication**
    - Maintain a formal compliance communication register evidencing routine communication of the EA / EMPr obligations to employees, contractors and service providers (e.g., induction / toolbox talks / contract clauses; dates; responsible person).
    - Implement a formal environmental awareness training programme aligned with the EMPr's management plans, supported by auditable training records.
    - Ensure that internal compliance audits assess the full suite of EA conditions and the entire approved EMPr, rather than selected sections.

- ECO monitoring reports should be compiled monthly during operational phases and weekly during periods of active construction.
- Maintain a consolidated environmental compliance file, including:
  - Training attendance registers
  - Spill registers
  - Stormwater inspection logs
  - Soil handling records (stockpiles, stripping dates, volumes, etc.)
  - Maintenance schedules
  - Stakeholder engagement minutes.
- A site-specific Security Policy, including confirmation of personnel vetting procedures and associated training records, should be formally maintained on file and made readily available for future audit verification purposes.
- Provide formal notification to the DMPR of any updated contact details where these differ from the EA (e.g., updated postal address).

- **Biodiversity and AIP control**
  - The management measures prescribed in the approved Alien and Invasive Plant Control Plan (AIPCP) should be implemented and adhered to.
  - Formalise AIP clearing schedules.
  - Maintain documented AIP control measures, including appropriate handling / disposal of cleared AIPs to prevent re-establishment / spread.
  - Where clearing has expanded, consider additional erosion and AIP controls in newly disturbed areas.
- **Signage, and socio-economic and stakeholder engagement**
  - Update entrance signage to include all EA-required information, including at least three official languages, operating hours, and the full contact details of the EA holder and responsible site manager.
  - Strengthen community interface by ensuring surrounding communities are informed of the formal grievance mechanism and how to lodge complaints.
  - Formalise regular engagement with the SMCC.
  - Maintain documented evidence of how complaints and issues are received, investigated, addressed, resolved, and closed out, and retain this information for audit and verification purposes.
  - Consolidate all complaints received via any platform into a single register.
- **Nuisance risk management**
  - Address stagnant greywater observed near the change rooms (interim drainage / containment pending relocation) to prevent nuisance conditions / vector breeding.
  - Given proximity to sensitive receptors, ensure nuisance risks are proactively managed through improved stormwater / waste controls and ongoing monitoring.

- **Rehabilitation planning**
    - Develop and implement a progressive rehabilitation schedule, identifying disturbed areas and timelines for stabilisation and re-vegetation in accordance with the approved EMPr (and the updated EMPr once approved).
    - Vegetation is to be planted over the disturbed areas where there will be low traffic, as soon as possible.
- **Traffic and road management**
    - Install speed limit signage at 7#.
    - Document municipal engagement regarding road deterioration. Retain correspondence and issue tracking records as auditable evidence.
- **Visual management**
    - Introduce indigenous trees along the mine boundaries.
    - Implement vegetative / permanent screening at the fence between the Gedex Pit and the adjacent residential property (shooting range) to minimise visual exposure.
- **Air quality and dust management**
    - Install required windbreaks (north and eastern sides as prescribed).
    - All bare or exposed soil surfaces (access roads, internal roads and working areas) are to be stabilised and capped to minimise dust generation.
    - Extend gravel capping to remaining high-traffic unpaved roads.
- **Noise management**
    - Implement 4 m noise barriers around shafts.
    - Implement acoustic enclosures for tipping and transfer areas
    - Restrict high-noise activities during night-time, where feasible.
    - Record baseline noise levels for new equipment.

10 CONCLUSION

Prime Resources (Pty) Ltd conducted the biennial external compliance audit for the Cons Modder Mine in February 2026 in accordance with the legislative requirements of the National Environmental Management Act, No. 107 of 1998 (NEMA). The audit included a site inspection and a review of relevant documentation.

This external Environmental Audit Report (EAR) evaluates compliance with the conditions of the Environmental Authorisation (EA), approved on 7 August 2020, as well as the commitments outlined in the Environmental Management Programme (EMPr). The final EAR will be submitted to the DMPR of Gauteng, in accordance with Conditions 4 and 5.1 of the EA.

In compliance with Regulation 34 of the Environmental Impact Assessment Regulations (2014), Newshelf 1186 (Pty) Ltd is required to notify all potential and registered Interested and Affected Parties (IAPs) within seven days of submission and to make the report available on its publicly accessible website and to any person on request.

During the audit review period (November 2023 to February 2026), the mine comprised concurrent construction and operational activities at 7# and 10#. The surface infrastructure footprint expanded from 6 ha to approximately 36 ha to accommodate the development and operation of the trackless decline portal within the Gedex Pit and associated surface infrastructure. This expanded footprint is not reflected in the approved EMPr. An application for a new EA and associated EMPr amendment remains under review by the Department of Mineral Resources and Petroleum (DMPR) at the time of reporting.

A total of 85 EA conditions and 226 EMPr commitments were reviewed during the audit. Of the EA conditions, 58 were considered auditable and relevant to the reporting period, while 175 of the EMPr commitments were assessed. Overall compliance with the EA was assessed at 72.4 %, and compliance with the EMPr was assessed at 76.3 %. This reflects a reduction in compliance compared to the previous biennial audit (EA: 86.4 %; EMPr: 91.2 %), primarily attributable to the expansion of the project footprint and the commencement of associated activities prior to obtaining the required regulatory authorisations.

Of the 58 auditable EA conditions relevant to the reporting period, eight were assessed as non-compliant (NC), 16 as partially compliant (PC), and the remainder as compliant. Several long-standing non-compliances identified in previous audits remain outstanding. The PC and NC conditions primarily relate to the following:

- Expansion of the operational footprint beyond the originally authorised extent and deviation from the approved layout, coordinates and buffer requirements.
- Commencement of additional listed activities, waste management activities, and Section 21 water uses prior to issuance of amended authorisations.
- Temporary storage of ore and residue materials triggering waste licensing requirements.
- Incomplete implementation of formal stormwater and dirty water management systems, including separation of clean and dirty water areas and sediment control infrastructure.
- Waste and hydrocarbon storage areas are not fully compliant with impermeable flooring, roofing and containment requirements.
- Inconsistent secondary containment, storage on bare soil, absence of drip trays, and need for strengthened spill documentation.

- Increased erosion and runoff risk associated with expanded disturbed areas.
- Vegetation clearance and buffer management are not fully aligned with the approved EMPr, including the need for strengthened alien invasive plant control measures.
- Incomplete entrance signage and failure to formally notify the DMPR of updated postal address.
- The Emergency Response Plan does not explicitly address spill incidents.
- Complaint management and close-out procedures were not formally documented for audit review, and complaints received via email and other platforms were not consistently consolidated into a single register.

Of the 175 auditable EMPr conditions relevant to the reporting period, 21 were assessed as NC, 41 as PC, and the remainder as compliant. Several long-standing PCs identified in previous audits remain outstanding. The PC and NC conditions primarily relate to the following:

- Expansion of the operational footprint beyond the originally authorised area, with amendment processes still pending.
- Vegetation clearing outside the approved layout and limited implementation of boundary screening measures.
- Increased extent of exposed and disturbed areas due to concurrent construction and operational activities.
- Limited progressive rehabilitation and revegetation of completed disturbed areas.
- Incomplete implementation of formal stormwater and dirty water management infrastructure across the expanded footprint.
- Inadequate separation of clean and dirty water areas in line with regulatory requirements.
- Absence of silt traps and limited structured erosion and sediment control measures.
- Water use activities associated with expanded infrastructure commenced prior to the issuance of a consolidated WUL approval.
- Partial implementation of dust mitigation measures, including inconsistent gravel surfacing and the absence of formal windbreak structures.
- Ore loading and transfer areas are not fully enclosed to minimise dust emissions.
- Engineered noise mitigation measures (e.g., barriers, enclosures) not fully implemented despite recorded exceedances.
- Inconsistent secondary containment and drip tray usage for hydrocarbon-containing equipment.
- Storage of hydrocarbons and hazardous substances directly on soil or without adequate secondary containment.
- Absence of a formalised spill and contaminated-soil register.
- Waste skips and certain storage areas are not consistently located on hardened, impermeable surfaces.
- Alien invasive plant control undertaken but not formally documented with adequate recordkeeping.
- Stakeholder engagement (specifically State Mines Country Club), an in-migration management plan, and socio-economic monitoring are not fully formalised or documented.
- Complaint management, grievance communication, and formal complaint recording and close-out were not fully implemented or documented.

While regulatory licencing processes (including a new EA, EMPr amendment, Section 102 application, WML application and WUL consolidation) have been initiated, some activities associated with the expanded footprint commenced prior to the issuance of approvals. As such, several NCs and PCs relate to regulatory alignment and infrastructure layout deviations.

Based on the available information at the time of the audit, no evidence of widespread pollution, intentional environmental degradation, or irreversible environmental harm was observed. However, the current compliance gaps present regulatory and environmental risk if not addressed. The risks associated with the expanded footprint, particularly in relation to stormwater management, erosion, waste handling and dust generation, remain manageable, provided that the recommended corrective and preventative measures are implemented without delay.

Finalisation of the regulatory approvals, together with the effective implementation of the actions outlined in Section 9, will improve compliance performance and alignment with statutory obligations, and support the continued operation of the mine in accordance with sustainable development principles.

Compliance will be re-assessed during the next biennial audit in 2028, in accordance with the prescribed conditions of the EA.