

**BIANNUAL ENVIRONMENTAL AUTHORISATION AND ENVIRONMENTAL
MANAGEMENT PLAN AUDIT REPORT IN TERMS OF REGULATION 34 OF
THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2014
PUBLISHED IN TERMS OF THE NATIONAL ENVIRONMENTAL
MANAGEMENT ACT 107 OF 1998**

EA reference number: LP30/5/1/2/3/2/1(58)EM

PREPARED FOR:

DE BEERS CONSOLIDATED MINES: VENETIA MINE, MUSINA

ENVIRONMENTAL AUDIT IN TERMS OF REGULATION 34 OF THE EIA REGULATIONS 2014	
Audit Team:	Project Coordinator and Auditor: Liezl Sterne Mervyn Taback Incorporated
	Reviewer: Erika van der Linde Aquatox Consulting (Pty) Ltd
Audit date:	30 April 2024
Report finalised:	1 July 2024
Reference number:	C00052/M00129

1. INTRODUCTION

- 1.1 Mervyn Taback Incorporated Trading As Tabacks (“**Tabacks**”), in conjunction with Aquatox Consulting Pty Ltd (referred to as the “**Audit Team**”), was appointed by De Beers Venetia Mine (“**DVM**”) to undertake an Environmental Audit in terms of regulation 34 of the Environmental Impact Assessment (“**EIA**”) Regulations 2014¹ published in terms of the National Environmental Management Act 107 of 1998 (“**NEMA**”) in respect of DVM’s Emulsion Plant and related mining infrastructure at Venetia Mine Environmental Management Programme (“**EMPR**”). The Environmental Audit and Performance Assessment were undertaken per the approved Scope of Work dated 20 February 2024.

2. PURPOSE OF THE ENVIRONMENTAL AUDIT AND AUDIT METHODOLOGY

- 2.1 The purpose of the Environmental Audit as contemplated in Regulation 34 read with Appendix 7 of the EIA Regulations 2014 is to determine the:

2.1.1 the level of compliance with the conditions of the environmental authorisation and the EMPR, and where applicable, the closure plan; and

2.1.2 the extent to which the avoidance, management, and mitigation measures provided for in the EMPR, and where applicable, the closure plan achieves the objectives and outcomes of the EMPR, and the closure plan, where applicable.

- 2.2 In order to achieve the aforementioned purpose, the Audit Team followed the following methodology:

2.2.1 Audit preparations were confirmed during March 2024;

2.2.2 Site visit and interviews were conducted with key staff members on 30 April 2024;

2.2.3 Consideration of documentation provided during the previous assessment and during the site visit;

2.2.4 Assess the level of compliance based on observations made by the independent Audit Team during the site visit and review of the documentation provided. This activity entailed the following:

2.2.4.1 An assessment of the status of formal compliance at a site level. That is, determine whether required commitments and management objectives have been met by the site following submission of relevant documented proof;

2.2.4.2 An assessment of the level of actual compliance at the site in respect of specific commitments and management objectives as provided for in the approved

¹ Published in GNR 982 of 4 December 2014 (as amended by GN 326 of 7 April 2017)

EMPR as well as the extent to which the avoidance, management and mitigation measures provided for in the EMPR achieve the objectives and outcomes of the EMPR;

2.2.4.3 Preparation of the Audit Report and distribution thereof to DVM for consideration and comments.

2.2.4.4 Finalisation of the Environmental Audit Report and distribution thereof to DVM for submission to the completed authority as required.

3. ASSUMPTION AND LIMITATIONS

3.1 The findings recorded in this Audit Report are limited to the documents received and verified as well as the site observations made at the areas visited during the assessment undertaken on 30 April 2024.

3.2 The Audit Team's findings as set out in this Report have been prepared with a view of submitting same to the Competent Authority in compliance with Regulation 34 of the EIA Regulations 2014.

4. AUDIT TEAM AND DECLARATION OF INDEPENDENCE

4.1 Audit Team

4.1.1 Tabacks is a firm of attorneys specialising in, amongst others, environmental law. Tabacks has been appointed by DVM as the project coordinator for purposes of the environmental-legal component of the Environmental Audit.

2.1.1 The project was coordinated and the site visit component of the Environmental Audit was undertaken by Mrs. Liezl Sterne, a Director at Tabacks. Liezl completed her LLB degree with the University of South Africa and was admitted as an attorney in 2011. Liezl specialises exclusively in Safety, Health, and Environmental ("SHE") law, has extensive experience in the legal interpretation of SHE and administrative law statutes, and has conducted numerous SHE-legal requirements and compliance audits.

4.1.2 The technical component and review of the Environmental Audit were undertaken by Ms. Erika van der Linde, a registered EAP (reg. nr. 2020/2247) who graduated with B.Sc, PHED, B.Ed, and M.EM (Environmental Management) from the University of the Free State. After 12 years of teaching natural and applied sciences at various secondary and tertiary institutions accredited with the Department of Education, she joined Ferret Mining and Environmental Services (Pty) Ltd from April 2003 to December 2017 as an environmental scientist. In January 2018 Ms van der Linde founded Aquatox Consulting (Pty) Ltd ("Aquatox"). Ms van der Linde is also a

registered ISO Systems auditor with TÜV SÜD, Germany, and has extensive experience in the following:

- 4.1.2.1 Specialist contributions to environmental projects, including ecology and biology;
- 4.1.2.2 Compilation of Environmental Management Programme Reports, Environmental Management Plans, Environmental Impact Assessments and Environmental impact reports, Environmental Management Programme performance assessments and audits;
- 4.1.2.3 Compiling feasibility studies;
- 4.1.2.4 Environmental due diligence assessments;
- 4.1.2.5 Water use license applications and water use registration;
- 4.1.2.6 Liaison with authorities on the acquisition of mining rights and permits and prospecting rights;
- 4.1.2.7 Prospecting rights, mining permit, and mining right applications;
- 4.1.2.8 Compliance evaluations and audits;
- 4.1.2.9 Development and Implementation of ISO 14001-certified Environmental Management Systems;
- 4.1.2.10 Auditing of ISO 14001-based Environmental Management Systems (audit log available on request).

4.2 **Declaration of Independence**

- 4.2.1 Tabacks hereby declares that it is an independent legal advisor and has no business, financial, personal or other interest, except fair remuneration for the undertaking of the Environmental Audit in terms of regulation 34 of the EIA Regulations 2014 published in terms of the NEMA. Tabacks further declares that there are no known circumstances that compromised the objectivity of Tabacks in the undertaking of the Environmental Audit.
- 4.2.2 In addition to the above, Aquatox herein declares that it is an independent environmental consultant and has no business, financial, personal, or other interest, except fair remuneration for the undertaking of the Environmental Audit in terms of regulation 34 of the EIA Regulations 2014 published in terms of the NEMA. Aquatox further declares that there are no known circumstances that compromised the objectivity of Tabacks in the undertaking of the Environmental Audit.





5. ACKNOWLEDGEMENTS

- 5.1 The Audit Team extends its appreciation to the De Beer's Environmental Team at DVM who provided verbal, visual, and documentary assistance during the assessment.

6. AUDIT FINDINGS

- 6.1 In this section of the Report, the Audit Team sets out the commitments and/or management objectives as provided for in the approved EMPR and the findings following the assessment of compliance in respect of the aforesaid commitments and/or management objectives. In the Table below reference is made to general observations made during the documentation review/assessment as well as site-specific observations made during the site visit.
- 6.2 The EMPR conditions and our findings concerning its status of compliance with the EMPR conditions are set out in Table A below.

The following terminology is utilised throughout the Report, of which the following meanings have been assigned thereto:

-  **“Compliant”** - means that satisfactory evidence was provided during the assessment to illustrate the fulfilment of a specific condition/commitment.
-  **“Non-compliance”** - means the failure to comply with or satisfy the requirements of a condition/commitment;
-  **“Partial Compliant”** - means that although steps were taken toward fulfilling a specific condition, at the time of the assessment full compliance had not yet been achieved. Therefore, the client is required to instigate further action to obtain full compliance with the provision(s) of the condition/commitment.
-  **“Noted”** - means the condition was not audited, if the condition does not require the client to take any specific action and as such was only included for information purposes.

7. CONCLUSION

- 7.1 Following our assessment, we are of the view that:
- 7.1.1 In general, a high level of compliance was noted concerning the commitments assessed. There were, however, some instances of partial compliance that required DVM's attention, as is discussed in more detail in the report detail below.
- 7.1.2 All activities undertaken by DVM, and the environmental impacts associated with such

activities, are adequately addressed in the EMPR, and none of the partial-compliances noted warrants an amendment of the EMPR.

7.1.3 Based on the systems utilised by DVM, as well as the outcome of findings made in respect of this assessment, the approved EMPR appears to be adequate, suitable and effectively implemented to prevent or minimise the impacts of the DVM activities on the receiving environment and its neighbouring communities.

7.1.4 Notwithstanding the above, it is to be noted that foundations could not be established as a result of the rocky outcrop as such DVM constructed a terrace with compacted waste rock as a base on which the waste rock infrastructure was erected. This is not perceived to have any significant and/or unmanaged impact on the environment and approval for such change was received by the Department of Mineral Resources and Energy. Construction of the terrace commenced in December 2022, which had been before the receipt of the environmental authorisation, however, permission was received to proceed in this manner. We confirm that the construction of the terrace did not trigger any listed activity. In addition, we noted that resulting from the above, the implementation of a formal stormwater management system is not required and confirm that any runoff water, due to the construction and contouring of the terrace, will naturally drain and collect around the pit sumps.

TABLE A

Table 9.5 Environmental Management Measures: Construction of Emulsion Plant

EA Site-Specific Conditions

NO	CONDITION	FINDING STATUS	COMMENTS
1.	Protected plant species must not be removed (disturbed, cut and destroy their products which may not be possessed, collected, removed, transported, exported, donated, purchased, or sold) unless the necessary permission is granted by the Department of Agriculture (DA).		<p>Compliance:</p> <p>We understand if any clearing is required the Site Disturbance and Change Management procedures are enforced. In this regard it was specifically noted that no clearing may commence without first obtaining the required permission from DVM. During the assessment it is confirmed and verified that all Contractor employees whose duties relate to/ and or include site clearing have been trained on the necessary procedures.</p> <p>In this regard Tabacks was provided with a copy of the completed Site Disturbance Form for the construction of additional temporary emulsion facilities for use in the VUP project. Upon perusal of the Form we noted that a total of approximately 0.95 Ha will need to be cleared for the project.</p> <p>Five protected trees (<i>Boscia Albitrunca</i>) were identified. We understand that a tree permit application was submitted to the DFFE and it was confirmed by the regulator that a permit will not be required for the project.</p> <p><u>Conclusion:</u></p> <p>From the information received it is apparent that DVM has a process in place that will ensure that no ground clearing and/or removal of protected plants/trees will be done before the relevant assessment is completed and the necessary</p>

NO	CONDITION	FINDING STATUS	COMMENTS
			<p>permits, if so required obtained.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Surface Disturbance Management Plan (VEN-00000326) completed under ref nr SD-VUP-MIN-115; • Change Management Assessment Form (VEN-00000324)
2.	All development footprint areas and areas affected by the proposed development must remain as small as possible and must not encroach onto the surrounding sensitive areas and the associated buffer zones.		<p>Compliance:</p> <p>As per the above statement, we understand if any clearing is required the Site Disturbance and Change Management procedures are enforced.</p> <p>Tabacks was provided with a copy of the completed Site Disturbance Form for the construction of additional temporary emulsion facilities for use in the VUP project. Upon perusal of the Form we noted that alternatives were considered to avoid, minimise or mitigate the impact. In addition, a tree count and assessment of the area was conducted. The form includes a map which identifies the area to be cleared within the construction footprint.</p> <p><u>Site observation:</u></p> <p>During our site visit we observed that the development was constructed within the designated footprint and did not encroach on any surrounding sensitive areas, which was also confirmed by the SHE Officer from Orica Mining Services as well as a Senior Environmental Officer from DVM who has been appointed to conduct environmental inspections.</p> <p><u>Conclusion:</u></p> <p>From our observations and the information received it is apparent that DVM has a process in place that will ensure that clear perimeters are set out to ensure that development remains within the dilatated footprint. During construction</p>

NO	CONDITION	FINDING STATUS	COMMENTS
			<p>periodic inspections were conducted by both the SHE and Environmental officers responsible for the area to ensure compliance in this regard.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Surface Disturbance Management Plan (VEN-00000326) completed under Ref nr SD-VUP-MIN-115; • Environmental Officer's Inspection Reports, dated September 2023 and January 2024.
3.	Terms and conditions of the Integrated Water Use License (IWUL) obtained from the Department of Water and Sanitation (DWS) must be adhered to.		<p>Noted:</p> <p>With regard to this project, an WUL would have been required for the installation and use of a conservancy tank envisioned to be placed in the area, however, it had been decided that DVM would not make use of a conservancy tank and instead used piping to tie-in with the existing sewage system at the mine. Notwithstanding, DVM conducts both internal and external auditing on environmental performance that includes an assessment of compliance with approved stormwater management plans and its approved Integrated Waste and Water Management Plan ("IWWMP").</p>
4.	Wetland and riverine areas are to be considered as no go zones unless authorisation is obtained. Ensure that construction activities are outside the demarcated wetland area. No activity should be allowed to encroach on to wetland system.		<p>Compliance:</p> <p>The final basic assessment report ("FBAR") compiled as part of the application for environmental authorisation required for this project included an assessment of sensitive areas, such as, wetland and riverine areas. We understand that there are no watercourses in close proximity to the proposed Emulsion Plant – see pages 56 and 57 of the FBAR.</p> <p>As per our statements under condition 1 and 3 above, we understand that if any clearing is required the Site Disturbance and Change Management procedures</p>

NO	CONDITION	FINDING STATUS	COMMENTS
			<p>will be enforced, which considers all environmental impacts associated with the development and which, amongst other things, include sensitive areas such as wetlands.</p> <p><u>Site observation:</u></p> <p>During the site visit no wetland or sensitive landscapes were noted in or around the development area.</p> <p><u>Conclusion:</u></p> <p>From the information received and in particular the FBAR we understand that there are no wetland and riverine areas in close proximity to the development area.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Surface Disturbance Management Plan (VEN-00000326) completed under ref nr SD-VUP-MIN-115, signed and dated 17/10/2022 • Final Basic Assessment Report, compiled by Alta van Dyk Environmental Consultants CC.
5.	Rehabilitation of the environment affected by any activities undertaken must be done as committed on the approved EMPR/BAR.		<p>Compliance:</p> <p>The FBAR includes an environmental management programme ("EMPR") to be implemented during the construction and operational phases. An assessment of compliance with the commitments as per the approved EMPR is set out in the Part B of this report.</p> <p>As per our statements under condition 1 and 3 above, we understand if any clearing is required the Site Disturbance and Change Management procedures are enforced that also considers rehabilitation required during and upon</p>

NO	CONDITION	FINDING STATUS	COMMENTS
			<p>completion of the project, as well as closure liability.</p> <p>Tabacks was provided with a copy of the completed Site Disturbance Form for the construction of additional temporary emulsion facilities for use in the VUP project. Upon perusal of the Form we noted reference that all rehabilitation and closure requirements associated with the disturbance are addressed.</p> <p>Notwithstanding the above, we confirm that DVM constructed a terrace with compacted waste rock as a base on which the waste rock infrastructure was erected.</p> <p><u>Site observation:</u></p> <p>Development took place within the footprint of the terrace, accordingly no rehabilitation is required in areas outside of the development footprint.</p> <p><u>Conclusion:</u></p> <p>From our observations and the information received it is apparent that the aspect register implemented that set out the risks and controls associated with the construction project include those conditions set out by the EMPR and that no rehabilitation would be required in this instance.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Surface Disturbance Management Plan (VEN-00000326) completed under ref nr SD-VUP-MIN-115, signed and dated 17/10/2022 • Final Basic Assessment Report, compiled by Alta van Dyk Environmental Consultants CC. • Orica Aspect Register, dated 10 November 2023 (excel document)

Department Standard Conditions

No:	Conditions	Current Compliance	Comments
1.	Scope of Authorisation		
1.1	The holder of EA shall be responsible for ensuring compliance with the conditions contained in the EA. This includes any person acting on the holder’s behalf, including but not limited to an agent, servant, contractor, subcontractor, employee, consultant or any person rendering a service to the holder of EA.		<p>Compliance:</p> <p>Prior to undertaking of any activities at DVM, employees and contractors undergo induction and training that include relevant legal requirements and site-specific procedures.</p> <p>Each contractor is required to keeps a SHE File on site that include record of all relevant procedures, the aspect register and proof of training and communication.</p> <p>In addition, a SHE Officer from Orica Mining Services as well as an Environmental Officer from DVM have been appointed to conduct environmental inspections to ensure compliance with the provision of the EA and EMPR. Any deviation identified is logged and followed up with corrective actions.</p> <p><u>Site Observation:</u></p> <p>During our assessment we noted that a copy of the EA is included in the contractors’ SHE File and an attendance register for EA discussions were evident.</p> <p><u>Conclusion:</u></p> <p>From the information received it is apparent that DVM has taken reasonable measures to ensure compliance with the conditions as set out in the EA, EMPR, and other applicable legal and other requirements.</p>

			<p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Environmental Officer's Report Inspection ref. 110277, dated 15/09/2023 • Orica Aspect Register, dated 10 November 2023 (excel document) • Attendance register Training on the EMPR and EA 11/10/2023 and
1.2	Any changes to, or deviation from the project description set out in this EA must be approved in writing by this Department before such changes or deviation may be effected. In assessing whether to grant such approval or not, the Department may request such information as 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.		<p>Noted:</p> <p>The contents of this condition are noted, we understand that there have been no changes or deviations to the project description that requires approval by the Department.</p>
1.3	The activities, which are authorised, may only be carried out at the property(ies) indicated in the EA and or on the approved EMPr.		<p>Noted:</p> <p>The contents of this condition are noted.</p> <p>We reiterate our comments as set out in condition 2 of the foregoing section above.</p>
1.4	Where any of the holder of the EA contact details change including name of the responsible person, physical or postal address/ or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA.		<p>Noted:</p> <p>The contents of this conditions are noted, we understand that there has been change to the holder of the EA's contact details.</p>
1.5	The EA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the undertaking of such activity(ies).		<p>Noted:</p> <p>The contents of this condition are noted and DVM is aware of its legal duties and responsibilities regarding its operations.</p>
1.6	The holder of EA must ensure that all areas where the authorised activities occur have controlled access to ensure safety of people and		<p>Compliance:</p> <p>Development and operation is taking place inside DVM's mining area. The whole</p>

	animals.		mine area is fenced off and strict access control is in place at the main entrance to the mine. <u>Site observation:</u> During the site visit we noted that the construction area had been demarcated and was fenced off with a gate at the entrance restricting access. Moreover, we noted signage at the entrance prohibiting entry of unauthorised persons. A security officer is also posted at the entrance to ensure that no unauthorised person enter the area.
2.	Appeal of Authorisation		
2.1	The holder of EA must in writing, with 14 (fourteen) calendar days from the date of this decision and in accordance with the EIA Regulation 4(2) do the following:		<p>Compliance:</p> <p>Tabacks was provided with a copy of the notice that was circulated to all I&APs. Approval of the EA was received on 8 June 2023 and a notification to all registered I&APs were set out on 12 June 2023 therefore falling inside the relevant time period stipulated in this condition.</p> <p>Upon perusal we noted that the notice makes specific reference to:</p> <ul style="list-style-type: none"> • the outcome of the application • the date of the decision received by DVM • the contact information of the holder of the EA • the appeals process that may be followed <p>In addition, a copy of the EA was attached as an appendix to the notice.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Email correspondence from Suzanne van Rooy, dated 12 June 2023 to all registered I&APs.
2.2	Notify all registered I&APs of- 2.2.1 The outcome of the application; 2.2.2 The date of the decision; 2.2.3 The date of issue of the decision and; 2.2.4 The reasons for the decision as included in Annexure 1 and Departmental Standard Conditions in Annexure 2.		
2.3	Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations.		
2.4	Draw the attention of all registered I&APs to the manner in which they may access the decision.		
2.5	Provide the registered I&APs with:		

	<p>2.5.1 Name of the holder (entity) of this EA: Venetia Mine (Pty) Ltd</p> <p>2.5.2 Name of the responsible person of this EA: Gavin Anderson</p> <p>2.5.3 Postal address of the holder: Private Bag X668 Musina 0900</p> <p>2.5.4 Telephonic and fax details of the holder: Tel: 015 534 9000 Fax: (086) 634 3967</p> <p>2.5.5 E-mail address of the holder if any: Gavin.anderson@debeersgroup.com</p>		
<p>3.</p>	<p>Commencement of the activity(ies)</p>		
<p>3.1</p>	<p>In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).</p>		<p>Compliance: Wearing of the correct PPE falls within the health and safety rules of the mine and as such no person will be permitted to work without the correct PPE. PPE requirements also form part of the Contractors Management and Onboarding Procedures. PPE is also issued to any visitors that visit the operation. <u>Site observation:</u> During the site visit Tabacks noted that contractors engaged in the construction project was wearing PPE.</p>

3.2	This EA must be provided to the site operator and the requirements thereof must be made fully known to him or her.		<p>Compliance:</p> <p>We reiterate our statement in condition 1.1 above.</p>
3.3	Hauling routes for construction vehicles and machinery must be clearly marked and appropriate signalling must be posted to that effect. Furthermore, movement of construction vehicles and machinery must be restricted to areas outside of the drainage line or wet areas.		<p>Compliance:</p> <p>DVM has a Code of Practice for Trackless Mobile Machines including a traffic management plan that has been developed in line with the Guideline for the compilation of a Mandatory Code of Practice for Trackless Mobile Machines, issued by the DMRE, which also applies to the construction area.</p> <p>We understand that requirements for machinery to be brought on to the mine is subject to the requirements of the COP and will not be permitted onto the mine prior to inspection and approval by the responsible engineer. All TMMs are reinspected and issued with a permit from the responsible engineer on a quarterly basis.</p> <p>We confirm that there are no wetlands and/or drainage lines in close proximity to the development footprint.</p> <p><u>Site observation:</u></p> <p>During the site visit we noted that vehicles were clearly marked, and appropriate signalling were noted. Furthermore, it was confirmed and verified that there are no wetland areas or drainage lines in or around the construction/operational area.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Mandatory Code of Practice for Trackless Mobile Machines
3.4	Appropriate notification sign must be erected at the construction site, warning the public (residents, visitors etc) about the hazard around the construction site and presence of heavy vehicles and machinery.		<p>Compliance:</p> <p>As per our above statement, construction is taking place inside DVM's mining area. Accordingly, no member of the public would be exposed to the construction activities.</p>

		<p><u>Site observation:</u></p> <p>We confirm that during our site visit we observed that the construction area was clearly marked and that unauthorised persons were not permitted to enter the area without the required consent.</p>
<p>3.5</p>	<p>Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as to not impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of storm water runoff.</p>	<p>Compliance:</p> <p>Tabacks was provided with a copy of the Stormwater Design. In accordance with the design, an earth v-drain or water diversion berm would be constructed on the southeast side of the site to decrease the amount of runoff that will accumulate on the site.</p> <p><u>Site observation:</u></p> <p>Following our discussions on site as well as our observations of the area we understand that as a result of the rocky outcrop no excavation had taken place and instead a terrace was constructed with waste rock and compacted in 150mm layers. As the terrace is elevated above ground level there would be no impeding of natural surface and subsurface water flow and as such there had been no need to implement the Stormwater Design. Notwithstanding, the slope design of the terrace was constructed in such that it prevents pooling of stormwater. We understand that any runoff from the area will collect in a cut-off trench that will naturally drain to the low-lying part of the site where it will report to the pit sumps from where it will be pumped or redirected for further use.</p> <p><u>Observation for action:</u></p> <p>Although the site was still under construction during our last audit, we noted that the contour of the terrace in some areas may result in pooling as the profiling had not yet been completed. The cut-off trench was also still under construction. DVB must ensure that the site slope and trench are completed before operation commences.</p> <p><u>Document ref:</u></p> <ul style="list-style-type: none"> • Stormwater Design compiled by LNW Consulting Engineers and Project

			Managers obo Orica Mining Services, undated
3.6	Vegetation clearance must be limited areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.		<p>Compliance:</p> <p>We reiterate our comments as set out in condition 1 and 2 of the foregoing section above.</p>
3.7	The holder of EA must note that in terms of the National Forest Act (Act No. 84 of 1998) protected plant species, also listed in Limpopo Environmental Management Act (Act No. 7 of 2003) must not be cut, disturbed, damaged, destroyed and their products must not be possessed, collected, removed, transported, exported, donated, purchased or sold unless permission is granted by the Department of Agriculture, Forestry and Fisheries.		
3.8	Construction areas (e.g. material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.		<p>Compliance:</p> <p>As mentioned above we understand if any clearing is required the Site Disturbance and Change Management procedures are enforced.</p> <p>In this regard Tabacks was provided with a copy of the completed Site Disturbance Form for the construction of additional temporary emulsion facilities for use in the VUP project.</p> <p>We understand that no bush clearing is done prior to soil stripping allowing for existing vegetation to be stockpiled. This method has proven successful in assisting with the propagating of plant species ensuring the correct mix of natural vegetation when the soil is appropriated for concurrent rehabilitation.</p> <p>Stockpile placement is determined by DVM's current operations. It was confirmed that smaller stockpiles are generated for the use of concurrent rehabilitation, whilst larger reserve piles, located in specifically demarcated areas, are covered with natural vegetation to preserve these stockpiles for later use and to prevent erosion. We noted that the Form specifically indicates that vegetation that is removed should be taken to the nearest stockpile and proof be supplied to the Environmental Superintendent.</p>

		<p><u>Site Observation:</u></p> <p>During our site visit we noted that due to the rocky outcrop of the development footprint area no topsoil was stripped for the area. Only vegetation was removed that will be used for rehabilitation at the Waste rock dumps. We noted that the vegetation had been scraped to the side of the development area and was advised that it will be removed upon completion of the construction phased.</p> <p><u>Conclusion:</u></p> <p>From the information received it is apparent that DVM has a process in place to ensure that topsoil is properly managed and since no new stockpile would be created for this project the approved strategic stockpiles already utilised by DVM would be used which is protected from pollution and is placed outside drainage lines. Given our site observations, it is noted that, in the circumstances, this condition does not find direct application to the development area.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Change Management Assessment Form (VEN-00000324) • EMS Surface Disturbance Management Plan (VEN-00000326) • Topsoil Management Procedure (DBG 03968)
<p>3.9</p>	<p>If any soil contamination is noted at any phase of the proposed activity(ies), the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this Department must be informed in this regard.</p>	<p>Compliance:</p> <p>DVM has a spill management procedure that is also implemented at the construction site.</p> <p>We received a copy of the aspect register that includes reference to spill management and sets out relevant and controls to be implemented.</p> <p>In addition, a SHE Officer from Orica Mining Services as well as a Senior Environmental Officer from DVM have been appointed to conduct inspections of the area to ensure compliance with the provision of the EA and EMPR, including management of spills and soil contamination. Any deviation identified is logged and followed up with corrective actions.</p> <p>We understand that DVM has previously investigated the possibility of on-site</p>

		<p>soil rehabilitation, however, did not find it to be feasible. All contaminated soil is taken to the salvage yard for safe disposal.</p> <p><u>Site observation:</u></p> <p>Bunded areas for placement of contaminated material was evident. At the time of the site visit no polluted material due to spillages were noted. We were also provided with proof of training of contractor employees on the spill management procedure. We further noted that spill sorb was available in the area.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM have the necessary controls in place to ensure compliance with this condition in that:</p> <ul style="list-style-type: none"> • Procedures for the management of spills in the area, as well as training of employees on respective procedures; • Checks are in place to ensure compliance with the relevant EMP requirements and procedures; • Availability of spill sorb material. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Spill Management procedure (VEN-00000212) • Bulk Hydrocarbon Spill Management procedure (VEN- 00001523) • Hazardous materials application and management procedure (VEN-00000196); • Emergency preparedness and response procedure (VEN-00001566); • Non-conformity and incident reporting procedure (VEN-00001675); • Environmental Competence and Awareness procedure (VEN-00001526);
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<ul style="list-style-type: none"> • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005) • Emulsion Spillage Management (VUP_PRO-0039) • Proof of contractor training on emulsion spillage management dated 4 April 2024
<p>3.10</p>	<p>An integrated waste management approach must be implemented that is based on waste minimization and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate. Uncontaminated rubble generated on the premises can be re-used as back filling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited on the adjacent properties or public places and open space.</p>		<p>Partial-Compliance:</p> <p>Tabacks was provided with a copy of the EMS Waste Management Procedure (“WMP”). Upon perusal we noted that the procedure is aligned with the provisions of section 16 of the National Environmental Management Waste Act, 59 of 2008 (“NEMWA”) – see page 4 of the WMP. We further understand that due to the strict security measures implemented by DVM no waste is permitted to leave the site. All waste is removed to the salvage yard from where it is sorted and stored into different categories of waste including that which can be reused and or recycled.</p> <p>We further received a copy of the aspect register that includes reference to waste management and specifically speaks to the separation of waste at source.</p> <p><u>Site observation:</u></p> <p>In general, good waste management practices were noted. However, we noted that one of the contractors on site Thavha who had been provided with a demarcated/ laydown area adjacent to the construction site (although still within the development footprint). Upon inspection we noted that the area was littered with waste and waste materials that should be removed. We were informed that the Contractor will be vacating the site by 17 May 2024 and that the entire area will be cleaned before their departure. We also noted some windblown waste around the site that should be collected and disposed.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with</p>

			<p>this condition in that:</p> <ul style="list-style-type: none"> • Procedures and systems have been developed to ensure that the hierarchy of waste is applied; • Waste is managed from one central place within the mine; • Availability of labelled wheelie bins and inspection of waste areas. <p>Notwithstanding action is required to ensure that waste is properly managed and/or does not accumulated in contractor laydown areas.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005); • Procedure for Minimising Waste at the Plant (SHE-ORICA VUP-SOP-004).
<p>3.11</p>	<p>In terms of section 28 and 30 of the NEMA, and sections 19 and 20 of the National Water Act, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the holder of the EA reads through and understand the legislative requirements pertaining to the project. It is the Applicant's responsibility to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.</p>		<p>Compliance:</p> <p>We reiterate our comments as set out in condition 3 of the foregoing section as well as condition 1.1 above.</p>
<p>3.12</p>	<p>Construction vehicle must be serviced and maintained in the manner whereby no excessive smokes and noise production is reduced to acceptable levels, and to prevent oil leaks. Contaminated soil must</p>		<p>Compliance:</p> <p>As per our statement set out under condition 3.3 above, DVM has a Code of Practice for Trackless Mobile Machines including a traffic management plan that</p>

	<p>be remediated on site or removed to an authorised landfill site.</p>		<p>has been developed in line with the Guideline for the compilation of a Mandatory Code of Practice for Trackless Mobile Machines, issued by the DMRE, which also applies to the construction area.</p> <p>We understand that requirements for machinery to be brought on to the mine is subject to the requirements of the COP and will not be permitted onto the mine prior to inspection and approval by the responsible engineer. These inspections are conducted quarterly and will include a review of services conditioned, if so required.</p> <p><u>Site observation:</u></p> <ul style="list-style-type: none"> • During the site visit vehicles appeared to be in order and no spills were evident on the site. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Mandatory Code of Practice for Trackless Mobile Machines
<p>3.14</p>	<p>Residents (if any) on the property(ies) and surrounding areas must be informed if any unusually noisy activities are planned.</p>		<p>Noted:</p> <p>DVM takes note of this condition, however, since the construction site is located inside the mining area, most of the noise generated at the construction site will be masked by the mining activities, that is a 24-hour operation. In addition, there are no close residence around the mine. Nonetheless, the mine implements a noise monitoring programe.</p> <p>Upon perusal of the aspect register we noted that the management of noise has been identified and included. In this regard we noted that the term of this condition is specifically included as a control, as well as others, i.e. blasting may only take place during daylight hours.</p> <p>No complaints regarding any of the associated construction activities were received.</p> <p><u>Document Ref:</u></p>

			<ul style="list-style-type: none"> • EMS Monitoring, Measurement, Analysis and Evaluation Procedure (VEN-00001648); • Communication procedure (VEN-00001522); • Complaints Register.
3.15	Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust.		<p>Compliant:</p> <p>DVM includes construction in its dust suppression programme.</p> <p>DVM applies the limits as prescribed by the National Dust Control Regulations (GNR 827 of 2013), any exceedance is logged and investigated in accordance with DVM's non-conformance procedures.</p> <p>Dust Emissions have been identified in the Aspect Register and is controlled by way of including, but not limited to, regular application of water via a water cart.</p> <p>Dust monitoring at VUP forms part of the DVM's monitoring schedule.</p> <p><u>Conclusion:</u></p> <ul style="list-style-type: none"> • Dust control measures are in place and the effectiveness of these controls is measured at VUP. • Limited exceedances were evident during a calendar year, however, the number of exceedances fall within the limits as provided in GNR 827/2013 and are not exclusive to the development project. • Non-Compliances/exceedances are investigated and addressed as per the EMS system standard procedures. <p><u>Document Ref.:</u></p> <ul style="list-style-type: none"> • EMS Monitoring, Measurement, Analysis, and Evaluation Procedure (VEN-00001648).
3.16	Mixing of cement, concrete, paints, solvent, sealants and adhesive must be done in specified areas on concrete aprons or on protected plastic linings to contain spillage or overflow onto soil to avoid contamination of underground water and environmental damage.		<p>Compliance:</p> <p>Upon perusal of the aspect register we noted that the mixing of concrete, solvents and substances alike are listed, and set out relevant controls to be</p>

		<p>implemented.</p> <p>In addition, a SHE Officer from Orica Mining Services as well as a Senior Environmental Officer from DVM who have been appointed to conduct environmental inspections of the area to ensure compliance with the provision of the EA and EMPR, including management of spills and soil contamination. Any deviation identified is logged and followed up with corrective actions.</p> <p><u>Site observation:</u></p> <p>At the time of the audit most of the construction had been completed. Notwithstanding we understand that if concrete is required, same is collected from the batch plant located at the VUP and trucked to the development site. During our site visit we noted that painting was being done, in this regard we noted that a drip sheet was used to prevent spills.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with this condition in that:</p> <ul style="list-style-type: none">• Procedures and systems have been developed to prevent soil contamination in the area;• Proof of contractor training on spill management, dated 4 April 2024• Spill management procedures and spill kits are available;• Regular inspection of the area to ensure compliance with procedures. <p><u>Document Ref:</u></p> <ul style="list-style-type: none">• Requirements for lay down area procedure (DBG 0517);• Spill Management procedure (VEN-00000212)• Hazardous materials application and management procedure (VEN-00000196);
--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<ul style="list-style-type: none"> • Emergency preparedness and response procedure (VEN-00001566); • Non-conformity and incident reporting procedure (VEN-00001675).
3.17	Should any heritage remains be exposed during operation or any actions on the site, these must immediately be reported to the South African Heritage Resources Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA) (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA).		<p>Compliant:</p> <p>A heritage assessment had already been conducted as included in the FBAR. Notwithstanding, DVM has a procedure regarding Heritage Resource protection in place that forms part of employees and contractor induction.</p> <p><u>Conclusion:</u></p> <p>Procedures are in place and are implemented to recognize and prevent the disturbance of archaeological sites.</p> <p><u>Document Ref.:</u></p> <ul style="list-style-type: none"> • EMS Heritage Resources Procedure (VEN-00000197); • EMS Surface Disturbance Management procedure (VEN-00000217); • Competency and Awareness Procedure (VEN-00001526)
3.18	Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.		<p>Not applicable:</p> <p>Terrace was built using waste rock and compacted in 15 mm layers to form the base of the plant, thus no excavation or backfill were required. Waste rock was tested and classified to determine compatibility to satisfy the relevant standard.</p>
3.19	Hydraulic fluid or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned immediately by removing spillage together with the polluted solids and dispose it in the authorised disposal site permitted of such waste. The regional office of the Department of Water and Sanitation must be notified within 24 hours of an incident that may pollute surface and underground water		<p>Compliant:</p> <p>DVM has a spill management procedure that is also implemented at the construction site.</p> <p>Upon perusal of the aspect register we noted that same includes reference to the prevention of contamination or pollution, and provision for spill management setting out relevant and controls to be implemented.</p> <p>Weekly inspections are conducted by the appointed Environmental Officer to ensure compliance with the provision of the EA and EMPR, including</p>

	<p>resources.</p>	<p>management of dangerous goods, spills and soil contamination. Any deviation identified is logged and followed up with corrective actions.</p> <p>Tabacks also received a copy of DVM's Non-conformity and incident reporting procedure that sets out the procedure for reporting of incidents to the relevant authorities as provided for in terms of section 20 of the National Water Act, 36 of 1998.</p> <p><u>Site observation:</u></p> <p>During the site visit we noted that dangerous goods used during construction at the time of our assessment, were limited to paint. These substances were kept in a metal cage with drip trays.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with this commitment in that:</p> <ul style="list-style-type: none"> • Checks are in place to ensure compliance with the relevant EMPR requirements and procedures; • Availability of Spill sorb; • Reporting and investigation of environmental incidents to prevent reoccurrences. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Spill Management procedure (VEN-00000212) • Hazardous materials application and management procedure (VEN-00000196); • Emergency preparedness and response procedure (VEN-00001566);
--	-------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<ul style="list-style-type: none"> • Non-conformity and incident reporting procedure (VEN-00001675); • Environmental Competence and Awareness procedure (VEN-00001526); • Learning form Incident Investigation, (VEN-00003853); • EMS Root Cause Analysis Form and Response Procedure (VEN-00001566) • Incident register.
3.20	Chemical sanitation facilities or system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorised waste water treatment works.		<p>Compliance:</p> <p><u>Site observation:</u></p> <p>At the time of our assessment the site was still under construction, however, nearing completion. As such, permanent ablution facilities were available for both males and females. At the time of our site visit, only one chemical toilet was still present on site but was no longer used. Notwithstanding, during our previous site visit, we noted 4 (four) portable ablutions were available at the construction site that was not occupied by more than 35 (thirty-five) contractor employees at a time. As such, compliance is noted.</p>
3.21	The holder of EA must ensure that any water uses listed in terms of Section 21 of the National Water Act must get authorisation from Department of Water and Sanitation prior to the commencement of such activity(ies).		<p>Noted</p> <p>The content of this condition is noted, we are not aware of any activities undertaken as part of this development project that requires/required a WUL or amendment of the existing IWUL held by DVM.</p>
3.22	This EA does not purport to absolve the holder of EA from its common law obligations towards the owner of the surface or land affected.		<p>Noted</p> <p>The content of this condition is noted.</p>
3.23	The holder of EA must ensure that rehabilitation of the disturbed areas caused by operation at all times comply with the approved EMPr.		<p>Noted</p> <p>The content of this condition is noted. A full assessment to determine compliance with the provisions of the EMPR is set out in the Part B of the report below.</p>

3.24	This EA may be amended or withdrawn at any stage for non-compliance and provides no relief from the provisions of any other relevant statutory or contractual obligations.		<p>Noted</p> <p>The content of this condition is noted.</p>
3.25	The holder of EA must note that in terms of Section 43A of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), residue deposit and residue deposit must be deposited and managed in a prescribed manner on any site demarcated for that purpose in the Environmental Management Plan or Environmental Management Programme. No person may temporary or permanently deposit residue stockpile ore residue deposit on any areas or site other than on site indicated on the Environmental Management Plan or Environmental Management Programme.		<p>Noted</p> <p>The content of this condition is noted.</p>
3.26	The holder of EA must note that in terms of Section 20 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), no person may commence, undertake or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of section 19(3) for that activity or a waste management licence is issued in respect of that activity if licence is required.		<p>Noted</p> <p>The content of this condition is noted.</p>
3.27	An appeal under Section 43(7) of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended) suspend an EA or exemption or any provisions of conditions attached hereto, or any directive unless the Minister directs otherwise.		<p>Noted</p> <p>The content of this condition is noted.</p>
3.28	Should you be notified by the Minister of a suspension of the authorisation pending appeal procedure, you may not commence with the activity(ies) until such time that the Minister allows you to commence with such activity(ies) in writing.		<p>Noted</p> <p>The content of this condition is noted.</p>

3.29	The Department reserves the right to audit and/or inspect the activity(ies) without prior notification at any reasonable time and at such frequency as may be determined by the Regional Manager.		Noted The content of this condition is noted.
3.30	The waste storage site must have a firm, impermeable, chemical resistant floors and a roof to prevent direct sunlight and rain water from getting in contact with the waste.		Compliance: <u>Site observation:</u> The site makes use of wheelie bins that are located in a caged hard surfaced (bunded) area).
3.31	The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming into contact with the waste and must be diverted away from the storage site.		Compliance: <u>Site observation:</u> Hydrocarbons to be used on site is limited to diesel. The 11240 l tank is enclosed in a self containing bunded tank with coupling spanning over an additional concrete bund with sump that can be cleaned and drained of any excess water if needed.
3.32	Subject to the commencement and duration requirements of the MPRDA and NEMA for the listed mining activity is valid for the period for which the aforesaid right is granted provided that this activity must commence within 10 years. If the commencement of the proposed activity does not occur within the specified period, the EA lapses and a new application for EA in terms of the NEMA and the EIA Regulations should be made for the activity to be undertaken.		Noted The content of this condition is noted. The project commenced on 12 July 2023 site handover is estimated to take place towards the end of April 2024.
3.33	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.		Noted The content of this condition is noted.
3.35	The listed activity(ies), including site preparation, must not commence within 20 (twenty) calendar days of the date of the notification of the decision being sent to the registered I&APs. In the		Compliance: Notwithstanding site preparation, commencement of activities only started on 12

	event that an appeal is lodged with the appeal administrator, the effect of this environmental authorisation suspended until such time as the appeal is decided.		July 2023 that is well within the timeframe provided.
3.36	Should there be any conflicting conditions between this EA and other approval granted by other authorities, it is upon the holder of EA to bring it to the attention of the Department for resolution.		Noted The content of this condition is noted.
4.	Management of Activity(ies)		
4.1	A copy of the EA and EMPr must be kept at the property or on site office where the activity(ies) will be undertaken. The EA and EMPr must be produced to any authorised officials of the Department who request to see it and must be made available for inspection by any employee or agent of the holder of the EA who works or undertakes work at the property(ies).		Compliance <u>Site observation:</u> During the site inspection, the contractor's SHE File including a copy of the risk register and EA was observed as well as the EMPR. We also noted that the EA and EMPR was posted on the site notice board located at the offices.
4.2	The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agent and any other people working on the site, and any updates or amendments to the EMPr must be submitted to the Department for approval.		Compliance: We reiterate the statement made in condition 1.1 above.
4.3	Regular monitoring and maintenance of storm water drainage facilities must be conducted at all times, if damaged as directed by the Department or any other relevant authority.		Not applicable: As already mentioned above there is no formal stormwater drainage required in the area.
4.4	A buffer zone of 100 metres between the activity(ies) and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.		Not applicable: As already mentioned above there are no residential or heritage sites in close proximity to the construction site as it is located inside the mine.
4.5	The holder of the EA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health		Compliance:

	hazards.		No complaints of any pests have been received to date.
4.6	The holder of the EA must ensure that all non-recyclable waste are disposed of at waste management facilities licenced to handle such wastes and all recyclable waste are collected by licenced waste management facilities for recycling, reuse or treatment.		<p>Compliance:</p> <p>Tabacks was provided with a copy of the WMP. Upon perusal we noted that the procedure is aligned with the provisions of section 16 of the NEMWA – see page 4 of the WMP. We further understand that due to the strict security measures implemented by DVM no waste is permitted to leave the site. All waste is removed to the salvage yard from where it is sorted and stored into different categories of waste including that which can be reused and or recycled.</p> <p>We further received a copy of the aspect register that includes reference to waste management and specifically speaks to the separation of waste at source.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with this condition in that:</p> <ul style="list-style-type: none"> • Procedures and systems have been developed to ensure that the hierarchy of waste is applied; • Waste is managed from one central place within the mine; <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005); • Procedure for Minimising Waste at the Plant (SHE-ORICA VUP-SOP-004).
4.7	The holder of the EA must ensure that all liquid wastes, whose emissions to water or land could cause pollution are diverted to		<p>Noted</p> <p>The content of this condition is noted, however, does not find application in this</p>

	sewer, after testing water quality and receiving written approval from the relevant local authority.		instance as there is no sewer system managed by the local authority at or around the mine.
4.8	Non-compliance with any condition of this EA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31L of NEMA.		Noted The content of this condition is noted.
4.9	This EA only authorises activities specified in the BAR/EMPr/closure plan and a new authorisation must be applied for in respect of any new activity not specified as part of the EMPr.		Noted The content of this condition is noted.
4.10	Only listed activities that are expressly specified in the BAR & EMPr that forms part of this EA may be conducted, and additional or new activities not specified herein must be applied for by the holder and authorised by the competent authority in the form of an amendment to the aforesaid EMPr before such activities may be commenced with. This condition is also applicable in the case of the amendment, addition, substitution, correction, removal or updating of any detail in the aforesaid EMPr.		Noted The content of this condition is noted. We confirm that the development activities are limited to the project description and listed activities approved in this EA.
4.11	Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPr.		Noted The content of this condition is noted. We reiterate our statement under condition 3.23 above in that a full assessment to determine compliance with the provisions of the EMPR is set out in Part B of the report below.
4.12	The Holder of EA must ensure that the name and contact details of the ECO is made available to the Regional Manager within 30 days of commencement. The Holder of EA must also ensure that an ECO is always available on site to ensure that activity(ies) at all times comply with the issued EA and approved EMPr.		Partial-Compliance: Proof of communication of the appointment for the Environmental Control Officer for the project, Ms Nirvana Ramlal was submitted on 26 September 2023. Although this was not done within 30 days of commencement of the project (i.e. 12 July 2023). Accordingly, a partial compliance audit is noted.
4.13	The ECO must:		Compliance:

4.13.1	Keep and maintain a detailed incident register (including any spillages of fuels, chemicals or any other material.		<p><u>Site observation:</u></p> <p>During our site visit it was confirmed and verified that the ECO keeps record of the following:</p> <ul style="list-style-type: none"> • Incident register; • Compliant register; • Monitoring and auditing of the site; • Copies of environmental reports; • Permits and licenses; <p>In addition, we received proof of monthly reports compiled in respect of the construction site that is submitted to DVM, the contractors as well as the Department. The last report compiled was dated March 2024.</p>
4.13.2	Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid re-occurrence of complaints.		
4.13.3	Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials.		
4.13.4	Keep copies of all environmental reports submitted to the Department.		
4.13.5	Keep the records of all permits, licences and authorisations required by the operation.		
4.13.6	Compile a monthly monitoring report and make it available to the Department if requested.		
4.14	The duties and responsibility of the ECO should not be seen as exempting the holder of the EA from the legal obligations in terms of the NEMWA and NEMA.		<p>Noted:</p> <p>The content of this condition is noted.</p>
4.15	The footprint of the activity(ies) must be limited on the areas authorised for the actual construction works and operational activities and all areas outside of the footprint must be regarded as a “no go” areas.		<p>Compliance:</p> <p>We understand if any clearing is required the Site Disturbance and Change Management procedures are enforced.</p> <p>Tabacks was provided with a copy of the completed Site Disturbance Form for the construction of additional temporary emulsion facilities for use in the VUP project. Upon perusal of the Form we noted that alternatives were considered to avoid, minimise or mitigate the impact. In addition, a tree count and assessment of the area was conducted. The form includes a map which identifies the area to</p>
4.16	Erosion and soil lost must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilising action such as gabions or re-vegetation must be		

	<p>implemented to prevent further habitat deterioration.</p>	<p>be cleared within the construction footprint.</p> <p>No sensitive areas had been identified following assessments conducted and due to the site being constructed on a terrace implementation of the stormwater design was not necessary.</p> <p><u>Conclusion:</u></p> <p>From the information received it is apparent that DVM has a process in place that will ensure that clear perimeters are set out to ensure that development remains within the dilatated footprint. Periodic inspections are conducted by the environmental officer responsible for the are to ensure compliance in this regard.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Surface Disturbance Management Plan (VEN-00000326) completed under ref nr SD-VUP-MIN-115, signed and dated 17/10/2022 • Environmental Officer’s Inspection Reports dated September 2023 and January 2024.
<p>4.17</p>	<p>The holder of the EA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risk involved. Records of training and verification of competence must be kept by the holder of EA.</p>	<p>Compliance:</p> <p>As per the provisions of the WMP no waste is permitted to leave the site. All waste is removed to the salvage yard from where it is sorted and stored into different categories of waste including that which can be reused and or recycled.</p> <p>We further received a copy of the aspect register that includes reference to waste management and specifically speaks to the separation of waste at source.</p> <p><u>Site observation:</u></p> <p>We were provided with proof of training of contractor employees on the WMP.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with this condition in that:</p>

			<ul style="list-style-type: none"> • Procedures and systems have been developed to ensure that the hierarchy of waste is applied; • Proof of training on procedures by contractor employees; • Waste is managed from one central place within the mine; • Availability of wheelie bins and inspection of waste areas. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005) • Procedure for Minimising Waste at the Plant (SHE-ORICA VUP-SOP-004); • Proof of training of contractor employees on the WMP and spill procedures dated 4 April 2024.
4.18	In order to prevent nuisance conditions, the holder of the EA must ensure that all storage skips and bins are not overfilled.		<p>Partial-Compliance:</p> <p><u>Site observation:</u></p> <p>In general, good waste management practices were noted. However, we noted that one of the contractors on site Thavha who had been provided with a demarcated/ laydown area adjacent to the construction site (although still within the development footprint). Upon inspection we noted that the area was littered with waste and waste materials that should be removed. We were informed that the Contractor will be vacating the site by 17 May 2024 and that the entire area will be cleaned before their departure. We also noted some windblown waste around the site that should be collected and disposed.</p>
5.	Reporting to the Department		

5.1	The holder of EA must:		Noted:
5.1.1	Submit an Environmental Audit Report to this Department biannually and such report must be done by qualified Environmental Assessment Practitioner and the audit report must specify whether conditions of this Environmental Authorisation and EMPr/closure plan are adhered to;		Tabacks was appointed to undertake the biannual assessment of compliance to the EA and EMPR as required in this condition. We confirm that this is the second report prepared and reviewed by an independent, qualified and registered EAP and specialist environmental attorney in accordance with the provisions of regulation 34 read with Annexure F of the EIA Regulations, 2014.
5.1.2	Identify and assess any new impacts and risks as a result of undertaking the activity(ies), if applicable;		The first Environmental Audit Report dated 5 December 2023 was submitted to the DFFE as well as interested and affected parties on 19 December 2023 that is well within the 30 day period stipulated in this condition.
5.1.3	Identify shortcomings in the EMPr/closure plan, if applicable;		
5.1.4	Identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMPr/closure plan;		
5.1.5	If applicable, specify that the correct action/s taken for the previous audit's non-conformities, was adequate;		
5.1.6	Specify the name of the auditor; and		
5.1.7	Be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.		
5.2	Should any shortcomings in terms of Regulation 34(4) be identified, the holder must submit recommendation to amend the EMPr/closure plan in order to rectify any shortcomings identified with the aforementioned audit report.		Noted: No shortcomings in terms of Regulation 34(4) was identified during the previous assessment that required rectification by DVM.
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		Noted: The content of this condition is noted. We confirm that to date no complaint, in

	the satisfaction of all concerned interested and affected parties.		relation to the construction project, had been received.
5.4	The holder of the EA must annually assess the environmental liabilities of the operation by using the master rates in line with the applicable Consumer Price Index (CPI) at the time and address the shortfall on the financial provision submitted in terms of section 24P of NEMA.		<p>Compliance:</p> <p>Upon request Tabacks were provided with the last financial liability cost estimate determined that includes the emulsion plant. Financial provisioning will be included for the project as part of the DVM's overall liability for rehabilitation at the end of the life of mine.</p>
5.5	The holder of the EA must, within 24 hours of incidents occurring, notify the Competent Authority of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.		<p>Compliance:</p> <p>We reiterate our statements as per condition 3.19 above.</p>
5.6	<p>The holder of the EA must, within 14 days, or a shorter period of time, if specified by the Competent Authority from the occurrence or detection of any incident referred to in condition 5.5, submit an action plan, which must include a detailed time schedule, and resource allocation signed off by top management, to the satisfaction of the Competent Authority of measure taken to-</p> <p>5.6.1 Correct the impact resulting from the incident;</p> <p>5.6.2 Prevent the incident from causing any further impact; and</p> <p>5.6.3 Prevent a recurrence of a similar incident.</p>		
5.7	In the event that measures have not been implemented within 21 days of the incident referred to in condition 5.6, or measures which have been implemented are inadequate the Competent Authority may implement the necessary measures at the cost of the holder of the EA.		<p>Noted:</p> <p>The content of this condition is noted.</p>
6.	Site security and access control		

6.1	The holder of the EA must ensure that effective access control on the site to reasonably prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.		<p>Compliance:</p> <p><u>Site observation:</u></p> <p>During the site visit we noted that the top10 risks were displayed at the entrance to the construction site.</p>
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.		<p>Compliance:</p> <p><u>Site observation:</u></p> <p>During the site visit the following observations were made:</p> <p>Signage: English and two other local languages.</p> <p>Notice board at entrance:</p> <ul style="list-style-type: none"> • Responsible person 2.6.1 • PPE requirements • No unauthorized entry indicated • DMR instructions • Mines work act • Declaration of work of Natural Importance • Emergency numbers • Snake handlers • First aider • Map • Top ten risks • Organogram
7.	Emergency Preparedness Plan		
7.1	The holder of the EA must maintain and implement an emergency preparedness plan and review it biannually when conducting audit and after each emergency and or major accident. The plan must amongst others, include:		<p>Compliance:</p> <p>DVM has procedures in place for the management and response of emergencies.</p> <p>Relevant procedures provided include:</p>

	<p>7.1.1 Site fire; 7.1.2 Spillage; 7.1.3 Natural disasters such as floods; 7.1.4 Industrial action; 7.1.5 Contact details of police, ambulances and any emergency centre close to the site.</p>		<ul style="list-style-type: none"> • Venetia Mine: Explosives storage emergency response plan procedure VEN-1879 • Venetia mine mandatory code of practice for emergency preparedness and response VEN 853 • Venetia mine EMS emergency preparedness and response procedure DBG 939. <p>Procedures have been updated to include reference to industrial action and natural disasters. At the time of the assessment training of the said procedures were still to be conducted. However, emergency drills were conducted during 2023. We also understand that all scenarios as per the EA have now been included in the proposed drill schedule for 2024.</p>
7.2	<p>The holder of EA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.</p>		<p>Compliance:</p> <p>A register is in place, however, to date no reportable emergency had occurred that was required to be reported.</p>
8.	Investigations		
8.1	<p>If, in the opinion of the Competent Authority, nuisances or health risks may be or is occurring on the site, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem.</p>		<p>Noted:</p> <p>The content of this condition is noted. We understand that to date no investigation has been initiated by the competent authority as set out in this condition.</p>
8.2	<p>If, in the opinion of the Competent Authority, pollution may be or is occurring, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the water quality variables, at those monitoring points and such frequency as may be specified by the Competent Authority.</p>		
8.3	<p>Investigations carried out in terms of conditions 8.1 and 8.2 above must include the monitoring of the relevant environmental pollution,</p>		

	nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Competent Authority.		
8.4	Should the investigation carried out as per conditions 8.1 and 8.2 above reveal any unacceptable levels of pollution, the holder of the EA must submit mitigation measures to the satisfaction of the Competent Authority.		
9.	Commission and Decommissioning		
9.1	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.		Noted: The content of this condition is noted.
10.	Site Closure		
10.1	The holder of EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of development.		Noted: The content of this condition is noted.
10.2	The application for closure indicated above must be submitted together with all relevant documents as indicated in section 43 of the Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended.		Noted: The content of this condition is noted.
10.3	No exotic plants may be used for rehabilitation purposes only indigenous plants can be utilised for rehabilitation purposes.		Noted: The content of this condition is noted.
10.4	The holder of EA remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of		Noted:

	<p>extraneous water, compliance with the conditions of EA and the management and sustainable closure thereof until the Minister has issued a Closure Certificate in terms of section 43 of Mineral and Petroleum Resources Development (Act 28 of 2002. Where necessary the Minister may retain certain portion of financial provision for residual, health or environmental impacts that might be known in future.</p>		<p>The content of this condition is noted.</p>
<p>11.</p>	<p>NEMA Principles</p>		
	<p>The NEMA Principles (set out in section 2 of NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment, inter alia, provides for:</p> <ul style="list-style-type: none"> ➤ The effects of decisions on all aspects of all environment to be taken into account; ➤ The consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment; ➤ The co-ordination and harmonisation of policies, legislation and actions relating to the environment; ➤ The resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and ➤ The selection of the best practicable environmental option. 		<p>Noted: The content of this condition is noted.</p>
<p>12.</p>	<p>Disclaimer</p>		

	<p>The Department of Mineral Resources in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.</p>		<p>Noted: The content of this condition is noted.</p>
<p>13.</p>	<p>Recommendations</p>		
	<p>In view of the above, the NEMA principles, compliance with the conditions stipulated in this EA, and compliance with the EMP/closure plan, the competent authority is satisfied that the proposed listed activity/ies will not conflict with the general objectives of Integrated Environmental Management stipulated in Chapter 5 of NEMA, and that any potentially detrimental environmental impacts resulting from the listed activity/ies can be mitigated to acceptable levels. The Environmental Authorisation is accordingly granted.</p>		<p>Noted: The content of this condition is noted.</p>

ANNUAL ENVIRONMENTAL MANAGEMENT PROGRAMME PERFORMANCE

EMPR reference number: LP30/5/1/2/2/58 (MR)

TABLE A

Table 9.5 Environmental Management Measures: Venetia Mine Construction (new underground mining and expansion project)

No:	Commitment / Management Objective	Compliance Status	Comments
1.	Soils		
1.1	Clearing of vegetation, removal of topsoil and stockpiling of topsoil		
1.1.1	<p>Potential Impact:</p> <p><i>Loss of soils due to compaction and erosion:</i></p> <p>There is limited topsoil available at the proposed project area, therefore impact on topsoil is expected to be low.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Demarcate the Emulsion plant and access roads footprint area. Vegetation clearing and removal of topsoil to be limited to the demarcated area. • Topsoil removed from the development footprint area must be stockpiled for use toward the mine's rehabilitation strategy. • No vehicles may drive on topsoil stockpiles. • Erosion mitigation strategies and proper stormwater management must be considered to limit erosion within the development footprint area. • Only proposed access roads and existing access roads to be used to reduce any unnecessary compaction. • Compacted areas are to be ripped to loosen the soil 		<p>Compliance:</p> <p>We reiterate the statements mentioned in the EA conditions above under conditions 1 – 3 and 3.2 above.</p>

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>structure where necessary.</p> <ul style="list-style-type: none"> A rehabilitation strategy focussed on revegetation must be initiated after the construction phase. 		
1.2	<p>Construction of Emulsion Plant and access roads</p> <p>Operation of Emulsion Plant</p>		
1.2.1	<p>Potential Impact:</p> <p><i>Contamination of soil:</i></p> <p>Soil can become contaminated due to spillage of hydrocarbons or other hazardous material.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> Prevent any spills from occurring. Machines must be parked within hard park areas or dedicated storage areas and must be checked weekly for fluid leaks. Contractors must have spill kits available to address any unlikely spillages. Hydrocarbons (such as diesel) and other hazardous material must be stored within a bunded area. Contaminated soils, if any, must be disposed of at the Venetia Mine waste disposal facility. 		<p>Compliance:</p> <p>DVM has a spill management procedure that is also implemented at the construction site.</p> <p>We received a copy of the aspect register that includes reference to spill management and sets out relevant controls to be implemented.</p> <p>In addition to the above, an Environmental Officer has been appointed by Orica Mining Services that conduct environmental inspections of the area to ensure compliance with the provision of the EA and EMPR, including management of spills and soil contamination. Any deviation identified is logged and followed up with corrective actions.</p> <p>We understand that DVM has previously investigated the possibility of on-site soil rehabilitation, however, did not find it to be feasible. All contaminated soil is taken to the salvage yard for safe disposal.</p> <p><u>Site observation:</u></p> <p>We reiterate our site observations included in the EA conditions above.</p> <p><u>Conclusion:</u></p>

No:	Commitment / Management Objective	Compliance Status	Comments
			<p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with this condition in that:</p> <ul style="list-style-type: none"> • Checks are in place to ensure compliance with the relevant EMPr requirements and procedures; • Awareness training; • Availability of Spill sorb and inspection. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Spill Management procedure (VEN-00000212) • Hazardous materials application and management procedure (VEN-00000196); • Training of contractor employees on all spill management and waste procedures dated 4 April 2024; • Emergency preparedness and response procedure (VEN-00001566); • Non-conformity and incident reporting procedure (VEN-00001675); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005)
1.3	Vegetation clearance, construction of Emulsion Plant and access roads		

No:	Commitment / Management Objective	Compliance Status	Comments
1.3.1	<p>Potential Impact:</p> <p><i>Soil erosion</i></p> <p>Increased bare surfaces, surface water runoff and potential for erosion and resulting in increased sedimentation loads.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • The Emulsion Plant footprint must be demarcated and vegetation clearing limited to the demarcated area. • Signs of erosion must be addressed immediately to prevent further erosion. • Implementation of a Stormwater Management Plan around Emulsion Plant. 		<p>Compliance:</p> <p>We reiterate the statements mentioned in the EA conditions above under conditions 1 – 3, 3.2 and 3.5 above.</p> <p><u>Site observation:</u></p> <p>During our site visit we noted that the side berm of the terrace on the southern side appeared to be prone to erosion. In this regard, we were advised and noted that additional material was added to stabilise the area. Furthermore, contouring of the terrace has been sloped in such a manner as to divert water from this area.</p>
2.	Biodiversity		
2.1	Clearing of vegetation, removal of topsoil and stockpiling of topsoil		
2.1.1	<p>Potential Impact:</p> <p><i>Loss of indigenous vegetation:</i></p> <p>Approximately 1,5 ha of indigenous vegetation will be cleared for the proposed Emulsion Plant and access roads. The vegetation clearing will take place within the current extended mining right area and in an area classified as other natural areas in terms of the Limpopo Conservation Plan. Other natural areas are defined as areas than contain natural habitat,</p>		<p>Compliance:</p> <p>We reiterate the statements mentioned in the EA conditions above under conditions 1 – 3 and 3.20 above.</p> <p><u>Site observation:</u></p> <p>From our site observations it appears that DVM has the necessary controls in place to ensure compliance with this commitment in that:</p> <ul style="list-style-type: none"> • Demarcate the footprint area. Restrict the removal of vegetation to the

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>but that are not required to meet biodiversity targets.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Demarcate the footprint area. Restrict the removal of vegetation to the footprint area only. • Cleared vegetation and debris that has not been utilised must be collected and disposed through an appropriate manner. • Collection of branches, wood (dead or alive), shrubs or any vegetation for fire making purposes is strictly prohibited. • Open fires at site is prohibited, including the burning of waste material. The irresponsible use of welding equipment, oxy-acetylene torches, and other naked flames, which could result in veld fires, or constitute a hazard should be guided by safe practice guidelines. • Provide temporary and suitable on-site ablution, sanitation, litter and waste management and hazardous materials management facilities until such time that adequate permanent and operational facilities can be provided. • Ablution anywhere other than in provided ablutions shall not be permitted. Under no circumstances shall use of the veld for ablution purposes be permitted. • A periodic clean-up of the surrounding natural 		<p>footprint area only.</p> <ul style="list-style-type: none"> • Cleared vegetation have been scrapped and will be used for rehabilitation at the Krone waste rock dump, the material however, was still to be removed at the time of the assessment. • The development takes place inside the mine that applies strict security measures as such branches, wood (dead or alive), shrubs or any vegetation cannot be taken out of the mine, further fire making of any kind inside the mine is strictly prohibited. • Suitable provision for collection waste as well as permanent ablutions were available on site. • We noted that the laydown area of some of the contractors requires attention, however, was informed that these contractors was preparing to vacate the site and that the laydown area demarcated for use would be cleaned and restored before their departure from site; • We noted that a two meter firebreak was established. At the time we noted that some combustible materials were still inside the fire break that must be cleared before the site is handed over.

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>environment should be undertaken to remove litter and prevent unwanted deterioration of the surrounding natural environment. Implement site induction for contractors and workers to familiarize them with all aspects relating to environmental components of the project.</p> <ul style="list-style-type: none"> • A firebreak surrounding the Emulsion Plant is recommended. 		
2.2	Clearing of vegetation		
2.2.1	<p>Potential Impact:</p> <p><i>Loss of protected plant and tree species:</i></p> <p>Although the area is classified as Other natural areas in terms of the Limpopo Conservation Plan, protected plant species could still be present.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • A pre-construction walkdown should be conducted to identify and geolocate protected plant species for permitting purposes. • No protected plant species may be affected, removed, excavated, relocated or impacted in any manner, except under a valid permit granted by the relevant authority and under the supervision of the appointed Environmental Officer. 		<p>Compliance:</p> <p>We reiterate the statements mentioned in the EA conditions above under conditions 1 – 3 above.</p>

No:	Commitment / Management Objective	Compliance Status	Comments
	<ul style="list-style-type: none"> Where possible, protected plants must be marked with high visibility indicators and clearance thereof should be avoided. If clearance of protected plants species cannot be avoided, apply for and acquire permits from DFFE (and possibly LEDET) for removal of protected plant species. 		
2.3	<p>Clearing of vegetation</p> <p>Construction of the Emulsion Plant</p> <p>Operation of the Emulsion Plant</p>		
2.3.1	<p>Potential Impact:</p> <p><i>Spread and/or establishment of alien and/or invasive species:</i></p> <p>Several invasive species have been identified on Venetia Mine, which, if left unchecked, will continue to grow and spread prolifically leading to further and more significant deterioration to the health of the natural environment within the project area.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> Implement the Alien Invasive Plant Management Plan, which identify species that pose the greatest threats, in terms of habitat transformation, within the development areas, and considers all appropriate chemical, mechanical, biological and cultural control methods to effectively control the species. 		<p>Compliance:</p> <p>We reiterate the statements mentioned in the EA conditions above under conditions 1 – 3 and 3.23 above. It is specifically noted that there will be no vegetation established on the terrace area.</p>

No:	Commitment / Management Objective	Compliance Status	Comments
	<ul style="list-style-type: none"> Use of locally indigenous plant species for landscaping purposes is strongly recommended. Under no circumstances shall exotic and invasive plants be used for landscaping purposes. An alien and invasive species control plan must be implemented; in line with the mine's approved procedures. Maintain the Alien Invasive Plant Management Plan, which identify species that pose the greatest threats, in terms of habitat transformation, within the development areas, and considers all appropriate chemical, mechanical, biological and cultural control methods to effectively control the species. 		
2.4	Construction of Emulsion Plant and access roads		
2.4.1	<p>Potential Impact:</p> <p>Introduction of nuisance vectors (pests) such as rodents and baboons.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> Ensure the correct handling, storage and operation of general waste generated on the construction site. Remove general waste generated frequently as to prevent the development of a breeding habitat for nuisance pests such as flies. 		<p>Compliant:</p> <p>DVM has a WMP that sets out specific waste management controls to be implemented to prevent the introduction of nuisance vectors. The aspect register developed for the construction project includes reference to waste management and specifically speaks to the storing and removal of waste to the central salvage yard.</p> <p><u>Site observation:</u></p> <p>As mentioned, lidded wheelie bins were noted at the site. With the exception of some windblown waste noted around the laydown area of Thava, general good</p>

No:	Commitment / Management Objective	Compliance Status	Comments
			<p>housekeeping and waste management practices were observed.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with its EMPR in that:</p> <ul style="list-style-type: none"> • Procedures and systems have been developed for the handling and storing and removal of waste in a manner that will prevent attracting nuisance vectors; • Training of contractor employees on waste management procedures was available on request; • Waste is managed from one central place within the mine; • Inspection of waste areas. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005); • Procedure for Minimising Waste at the Plant (SHE-ORICA VUP-SOP-004).
3.	Surface water		
3.1	Construction of Emulsion Plant and access roads		

No:	Commitment / Management Objective	Compliance Status	Comments
3.1.1	<p>Potential Impact:</p> <p><i>Contamination of surface water resources:</i></p> <p>Although there are no surface water resources (rivers) in close proximity to the Emulsion Plant, surface run-off may be contaminated by activities on site due to spillage of hydrocarbons or other hazardous material.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Storage of chemical and other hazardous substances in bunded areas. All contractors must have spill kits available and be trained in the correct use thereof. • No cleaning or servicing of vehicles, machines and equipment in unauthorized areas such as delineated wetlands. • Adequate sanitary facilities and ablutions must be provided for all personnel throughout the project area. • All waste generated on-site must be adequately managed and separated and recycled of different waste materials should be supported. • All machinery and equipment should be inspected regularly for faults and possible leaks, these should be serviced off-site. • Implementation of a stormwater management plan around the Emulsion Plant. 	Compliant	<p>Compliant:</p> <p>DVM has a spill management procedure that is also implemented at the construction site.</p> <p>Upon perusal of the aspect register we noted that same includes reference to the prevention of contamination or pollution, and provision for spill management setting out relevant and controls to be implemented.</p> <p>In addition to the above, a SHE Officer from Orica Mining Services as well as a Senior Environmental Officer from DVM were appointed that conduct environmental inspections of the area to ensure compliance with the provision of the EA and EMPR, including management of spills and soil contamination. Any deviation identified is logged and followed up with corrective actions.</p> <p><u>Site observation:</u></p> <p>We reiterate our observations as recorded in under conditions 3, 3.5, 3.19 and 3.20 of the EA above. In addition, a wash bay area was observed that is used to washdown vehicles before leaving the site as per the requirements of the VUP workings.</p> <p><u>Conclusion:</u></p> <p>Information provided during the assessment along with our site observations suggest that DVM has the necessary controls in place to ensure compliance with this commitment in that:</p> <ul style="list-style-type: none"> • Checks are in place to ensure compliance with the relevant EMPR requirements and procedures; • Pre-use inspections for TMMs;

No:	Commitment / Management Objective	Compliance Status	Comments
			<ul style="list-style-type: none"> • Awareness training; • Availability of Spill sorb and inspection; • Reporting and investigation of environmental incidents to prevent reoccurrences. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Spill Management procedure (VEN-00000212); • Contractor Employee training records; • Hazardous materials application and management procedure (VEN-00000196); • Emergency preparedness and response procedure (VEN-00001566); • Non-conformity and incident reporting procedure (VEN-00001675); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005); • Learning from Incident Investigation, (VEN-00003853); • EMS Root Cause Analysis Form and Response Procedure (VEN-00001566) • Incident register.

No:	Commitment / Management Objective	Compliance Status	Comments
4.	Groundwater		
4.1	Construction of Emulsion Plant and access roads Operation of Emulsion Plant		
4.1.1	<p>Potential Impact: <i>Contamination of groundwater resources due to spillage:</i></p> <p>It is anticipated that deterioration of groundwater quality may occur from the infiltration from contaminants including hydrocarbons due to spillage.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Implement the same mitigation measures as described for surface water above. 		<p>Compliant:</p> <p>We reiterate our finding and comments as set out above.</p> <p>It is specifically noted that infiltration of water on the terrace will be negligible and the risk is adequately managed and controlled.</p>
5.	Heritage		
5.1	Vegetation clearance, construction of Emulsion Plant and access roads		
5.1.1	<p>Potential Impact: <i>Impact on Archaeological Resources.</i></p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Implementation of a chance find procedure, should any archaeological sites be exposed during the construction phase. 		<p>Compliant:</p> <p>A heritage assessment was conducted and included in the FBAR. Notwithstanding, DVM has implemented controls regarding Heritage Resource protection and has a Chance Find procedure that forms part of employees and contractor induction.</p> <p><u>Conclusion:</u></p>

No:	Commitment / Management Objective	Compliance Status	Comments
	<ul style="list-style-type: none"> • If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Nokukhanya Khumalo/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule. • If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule. • With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above; • If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the 	Compliance Status	<p>Procedures are in place and are implemented to recognise and prevent the disturbance of archaeological sites. Notwithstanding the above, no digging occurred during construction.</p> <p><u>Document Ref.:</u></p> <ul style="list-style-type: none"> • EMS Heritage Resources Procedure (VEN-00000197); • EMS Surface Disturbance Management procedure (VEN-00000217); • Competency and Awareness Procedure (VEN-00001526)

No:	Commitment / Management Objective	Compliance Status	Comments
	heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA.		
6.	Noise		
6.1	Construction of proposed Emulsion Plant and access roads		
6.1.1	<p>Potential Impact:</p> <p><i>General rise in ambient noise levels:</i></p> <p>A general rise in ambient noise levels are expected during the construction phase, due to the movement on construction vehicles, undertaking of earthworks and general construction activities. However, the construction activities takes place within the existing extended mining right area, adjacent to an existing haul road, waste rock dump and explosives storage area. The increase in ambient noise is expected to be minimal.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Construction only to take place during daylight hours. • A complaints register must be available at the mine. Complaints must be attended to immediately as per the mine’s Grievance Procedure. • All construction equipment and vehicles must be 		<p>Compliant:</p> <p>We reiterate our findings as set out per condition 3.14 of the EA above.</p> <p><u>Conclusion:</u></p> <p>Notwithstanding, and in line with this specific commitment we conclude following the information provided and our site observations as follows:</p> <ul style="list-style-type: none"> • Construction only takes place during the daytime, no lighting is provided for nighttime work; • Complaints can be made as per DVM’s Communication procedure. • The specifications of machinery to be brought on to the mine is in-line with the requirements of the COP and no machine will not be permitted onto the mine prior to inspection and approval by the responsible engineer. • Whilst on site Tabacks noted that contractors working in the construction area was wearing the appropriate PPE. <p><u>Document Ref:</u></p>

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>regularly serviced to prevent excessive noise.</p> <ul style="list-style-type: none"> Construction vehicles and equipment generating excessive noise should be fitted with appropriate noise abatement measures. Personnel working on site should be provided Personal Protective Equipment and must be worn at all times during the construction phase. 		<ul style="list-style-type: none"> EMS Monitoring, Measurement, Analysis and Evaluation Procedure (VEN-00001648); COP for Trackless Mobile Equipment; Communication procedure (VEN-00001522).
7.	Air Quality		
7.1	Vegetation clearing Construction of Emulsion Plant and access roads Operation of the Emulsion Plant		
7.1.1	<p>Potential Impact:</p> <p><i>Increase in dust fallout:</i></p> <p>A general rise in dust fallout is expected during the construction phase, due to the clearance of vegetation and general construction activities. As construction activities will take place within the existing extended mining right area, adjacent to an existing haul road, waste rock dump and explosives area, the increase in dust fallout is expected to be minimal.</p> <p>Mitigation Measures:</p>		<p>Compliant:</p> <p>We reiterate our findings as set out per condition 3.14 of the EA above.</p> <p><u>Conclusion:</u></p> <p>Notwithstanding, and in line with this specific commitment we conclude following the information provided and our site observations as follows:</p> <ul style="list-style-type: none"> Dust-reducing mitigation measures include amongst other watering down of dirt roads; Monthly dust fallout monitoring forms part of Venetia Mine's overall air quality monitoring programme. Any Non-Compliances/exceedances will be investigated and addressed as per the EMS system standard procedures

No:	Commitment / Management Objective	Compliance Status	Comments
	<ul style="list-style-type: none"> Dust-reducing mitigation measures must be put in place and must be strictly adhered to, particularly for all dirt roads and any earth dumps in line with Venetia Mine's Air Quality Management Plans. Set speed limits to minimise the creation of fugitive dust within the project boundary. Continue with monthly dust fallout monitoring as part of Venetia Mine's overall air quality monitoring programme. 		<ul style="list-style-type: none"> Speed limits are set internally to minimise the creation of fugitive dust within the project boundary. The traffic management plan provides for a flow of vehicles through the area that will be restricted as to the number of vehicles that are allowed to enter the area at one time. <p><u>Document Ref.:</u></p> <ul style="list-style-type: none"> EMS Monitoring, Measurement, Analysis, and Evaluation Procedure (VEN-00001648).
8.	Fire Risk		
8.1	Construction of Emulsion Plant and access roads Storage of chemicals and other hazardous substances		
8.1.1	<p>Potential Impact: <i>Increased risk of on-site fires.</i></p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> A firebreak surrounding the Emulsion Plant must be made. All chemicals and hazardous substances (flammable) must be stored in dry areas and locked. Smoking is prohibited near flammable substances. Dedicated smoking areas must be made available for personal. 		<p>Compliant:</p> <p>Following our site visit and information received we, in terms of this commitment conclude that:</p> <ul style="list-style-type: none"> DVM does not permit any open fires on site. We noted that firebreaks have been established on the perimeter of the site. A designated smoking area was observed. Evidence of fire drills conducted in 2023 and 2024 were evident in the Contractor's SHE file. Furthermore, the use, handling, storing and disposal of hazardous chemicals

No:	Commitment / Management Objective	Compliance Status	Comments
	<ul style="list-style-type: none"> No open fires to be allowed on site. Fire extinguishers and other firefighting equipment deemed suitable must be available on site at all times 		<p>has been identified in the Aspect Register and is controlled in a number of ways including but not limited to:</p> <ul style="list-style-type: none"> Training and awareness regarding the risks associated with hazardous chemicals and substances including the risk of fire; Ensuring the availability of fire extinguishers in strategic places around the site; Contractors having assigned and trained fire fighters. (DVM also has an emergency response team that is located at the mine.) <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> Venetia Mine Hazardous materials, application and management procedure, (VEN-00000196); Orica Aspect Register, dated 10 November 2023 (excel document)
9.	Waste Management		
9.1	Construction of Emulsion Plant and access roads Operation of Emulsion Plant		
9.1.1	<p>Potential Impact:</p> <p><i>Increase waste generation due to construction activities.</i></p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> Rubble and other construction waste produced should be re-used if possible, otherwise be disposed of in line with the mine’s Waste Management License and associated 		<p>Partial-Compliance:</p> <p>We reiterate our findings as set out per condition 3.10 and 4.18 of the EA above.</p> <p><u>Conclusion:</u></p> <p>Inline with this specific commitment we conclude following the information provided and our site observations as follows:</p> <ul style="list-style-type: none"> Procedures and systems have been developed to ensure that the

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>procedures.</p> <ul style="list-style-type: none"> • Adequate bins must be provided on site and cleared regularly. • The construction area/Emulsion Plant must remain litter free and regular inspections for litter must be conducted. The activity should not contribute to any surrounding windblown litter. • Waste skips must be covered and emptied regularly. No overflowing to be allowed. • Empty cement bags must be kept in a sealed waste container. • Conservancy tank must be constructed within a bunded area. • General waste and hazardous waste must be stored in separate wheelie bins and/or skips on site. • Skips must be covered and designed to be impermeable. • Skips must be emptied regularly as required and waste taken to the Venetia Waste Management Facility. • The conservancy tank must be inspected regularly to ensure it does not overflow. • Conservancy tank to be emptied as required by a certified contractor and material disposed of at a licenced facility. 		<p>hierarchy of waste is applied;</p> <ul style="list-style-type: none"> • Waste is managed from one central place within the mine; • Availability of labelled skips/dustbins and inspection of waste areas; • It was decided that no conservancy tank will be installed at the site, piping that ties in with DVM's existing sewage system was installed; • Save for proof waste management and housekeeping demonstrated by Thava the measures implemented suggests that DVM implements measures to mitigate potential impacts associated with waste generation. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Requirements for lay down area procedure (DBG 0517); • Environmental Competence and Awareness procedure (VEN-00001526); • Waste Management procedures (VEN-00000927), (VEN-00000927) & (VEN-00002005)

No:	Commitment / Management Objective	Compliance Status	Comments
10.	Social		
10.1	Construction of Emulsion Plant and access roads		
10.1.1	<p>Potential Impact: <i>Benefits resulting from employment and income opportunities created by the construction of the Emulsion Plant:</i></p> <p>It is expected that approximately 20 employment opportunities will be created during the construction phase.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Develop a clear and concise employment policy prioritising local employment. • Employ local workers if qualified applicants with the appropriate skills are available. • Purchase goods and services at a local level if available. 		<p>Compliance: We understand that all appointments are made in accordance with DVM Employment and Recruitment Policies. Preference is given to local community members in respect of semi-skilled type jobs that is also confirmed in DVM's Contractor Employment Policy. In addition, DVM has various other employment programs in place to assist disabled and local members of the community.</p> <p>A maximum of four employees will be permanently station at the site once operation.</p> <p><u>Conclusions:</u> Information provided during the assessment suggests that DVM complies with the commitment and action plans indicated in the EMPR.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia mine local employment vetting completion form, Document number DBG010064 • Contractor's and Ethical Contracting 2019, V1
10.2	Storage and handling of dangerous goods		
10.2.1	<p>Potential Impact: <i>Risk to people and property:</i></p>		<p>Noted: During our visit the site was still under construction. DVM must take note of the</p>

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>The storage and handling of dangerous goods material could potentially cause safety risks to personnel handling the material, or pose risks to other buildings and infrastructure in close proximity to the storage areas.</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Strict access control to the Emulsion Plant must be implemented. No unauthorised persons may enter the Emulsion Plant area. • Undertake a quantitative risk assessment to determine the impact of various loss of containment (LOC) events, including the development of scenarios, consequence analysis and safety risk calculations. • Design of the production facility must be undertaken in accordance with risk management standards which determine the appropriate spacing between substance storage areas and operations with the aim of minimising risks. • Develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information. • Operating procedures must provide clear instructions not only to specify the steps for normal operations, but also for upset conditions, temporary operations, start-up, and emergency shutdown. 		<p>provisions included in this section.</p> <p>We understand that a formal handover will be done during June 2024.</p> <p>Standard operational and emergency procedures are already in place.</p> <p>Relevant studies such as a quantitative risk assessment will be determined prior to operations.</p> <p>SDS' were available for substances used during construction; however, this will be updated once operation commences. DVM must ensure that SDS are not older than 5 years.</p> <p>Operations will be fully integrated with DVM's standards and site rules that amongst other include, conducting of site-specific risk assessments, hazards and controls, using of appropriate PPE and training.</p> <p>Prior to operation DVM must ensure that the provisions set out in this commitment is fully implemented.</p> <ul style="list-style-type: none"> • All storage areas must conform to the provisions of the relevant local by-laws; • All dangerous goods must be stored on covered (roofed), concrete lined areas. • Clear signage of areas storing dangerous goods must be placed, indicating the hazards and appropriate PPE to be worn. • SDS sheets for each dangerous good must be developed and placed at the storage area on site.

No:	Commitment / Management Objective	Compliance Status	Comments
	<ul style="list-style-type: none"> • Important safety information that includes the basic hazards encountered or that could be encountered in the process must also be addressed in the operating procedures. Identification of hazard areas and limitations on the number of authorized personnel in the hazard area will ensure that the minimum numbers of personnel are exposed to the hazard. • All dangerous goods must be stored on covered (roofed), concrete lined areas. • Clear signage of areas storing dangerous goods must be placed, indicating the hazards and appropriate PPE to be worn. • MSDS sheets for each dangerous good must be developed and placed at the storage area on site. • Standard operating procedures must be developed and implemented. <ul style="list-style-type: none"> • Emergency response Plan must be developed and include as a minimum: <ul style="list-style-type: none"> • Signage (showing emergency contact numbers) • Site and area evacuation plan • Appropriate firefighting controls and fire risk management plans • Procedures to address emergencies such as 		

No:	Commitment / Management Objective	Compliance Status	Comments
	<p>accidents involving serious injuries</p> <ul style="list-style-type: none"> • Procedures that address the loss of normal communication systems • Communication system that covers employees, management, regulatory authorities, visitors and local emergency services. Crises Management • Appropriate Personal Protective Equipment (PPE) must be provided to personnel at all times. • All dangerous goods must be stored and handled using systems designed and operated in accordance with relevant legislative requirements. • Relevant controls of the management of dangerous goods must be adhered to. 		