

AUDIT REPORT

REGULATION 34 ENVIRONMENTAL AUDIT FOR THE RUSTENBURG PLATINUM MINES LIMITED: MORTIMER SMELTER



PREPARED FOR:	Rustenburg Platinum Mines Limited: Mortimer Smelter.
PREPARED BY:	Environmental Assurance (Pty) Ltd.
FINALISATION DATE:	DRAFT
CONTACT:	Claudette Kruger
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EXECUTIVE SUMMARY

BACKGROUND

Environmental Assurance (Pty) Ltd. (ENVASS), represented by an independent environmental consultant, was appointed by Rustenburg Platinum Mines (RPM), a subsidiary of Valterra Platinum: Mortimer Smelter (Hereafter referred to as “Mortimer Smelter”) to undertake the environmental compliance audit of the following Environmental Management Programmes (EMPr’s):

- Mortimer Smelter amended EMPr of 08 December 2021 (approved with reference No: 30/5/1/2/3/2/1/366 EM).
- Mortimer Smelter Sulphur Dioxide Abatement Project EMPr of November 2021 (Reference No. :41103087).

The Environmental Impact Assessment (EIA) Regulations of 2014 (as amended) as promulgated in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) (referred to herein as Regulation 34 Compliance Audit) requires compliance auditing of Environmental Authorisations (EA), Record of Decision’s (RoD), Environmental Management Programmes (EMPr’s) and Closure Plans (CP). The results, where required, in the form of recommendations and ultimately an amended EMPr to be submitted to the Competent Authority (CA) for approval.

Regulation 34 (Sub regulation 1) requires the holder of the EMPr to submit an audit report to the Competent Authority (CA) detailing findings of the audit report, including insufficient mitigation measures and the level of compliance that might require recommendations to amend the EMPr. Sub regulation 2 requires the audit report to be prepared by an independent person with relevant environmental auditing expertise.

AUDIT DETAILS

ENVASS undertook a site visit to conduct the Regulation 34 audit on the 11th of September 2025. In accordance with the requirements as set in the EIA regulations, the EMPr’s must be assessed for its ability to prevent, manage, and mitigate environmental impacts caused by the activities undertaken. This audit report will assess the implementation and adherence to the compliance commitments, requirements, and continued appropriateness and adequacy of the EMPr’s (Section 24 Q of NEMA).

EXTENT OF COMPLIANCE

Compliance to the audit criteria as set out in the various commitments contained in the EMPr’s, applicable to the operations were found to be largely compliant. Evidence was however found of aspects with non-compliance, which requires attention, and are detailed in Chapter 4 of this report.

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SUMMARY OF AUDIT FINDINGS

Mortimer Smelter amended EMPr of 08 December 2021 (30/5/1/2/3/2/1/366 EM)

The compliance audit undertaken in 2025 identified 119 compliances and 10 non-compliances related to the commitments stipulated as compliance requirements contained in the site-specific EMPr. A summary of the audit compliance rating is presented in Table 1 below, while the individual findings and observations are represented in Annexure A of this report.

Mortimer Smelter Sulphur Dioxide Abatement Project EMPr of November 2021 (41103087).

The compliance audit undertaken in 2025 identified 34 compliances and 0 non-compliances related to the commitments stipulated as compliance requirements contained in the site-specific EMPr. A summary of the audit compliance rating is presented in Table 1 below, while the individual findings and observations are represented in Annexure A of this report.

Table 1: Compliance vs Total Number of Commitments

Authorisation	Total number of Applicable conditions	Compliance %	Non – Compliance %
Amended EMPr (2021) Approved with Ref. No: 30/5/1/2/3/2/1/366 EM	129	92,25%	7,75%
Sulphur Dioxide Abatement Project EMPr - 41103087	38	100,00%	0,00%

The essence of auditing necessitates a process where only a sample of the actual activities and operations can be reasonably reviewed and therefore, Mortimer Smelter is advised to not use the report as a tick list for actions required towards increased environmental performance. Rather, that the commitments in non-compliance state are approached to address potential areas of improvement and that areas of compliance are highlighted for continual improvement and or effective maintenance initiatives. The compliance results are visually presented as comparative percentages of the total compliance in Figure 1.

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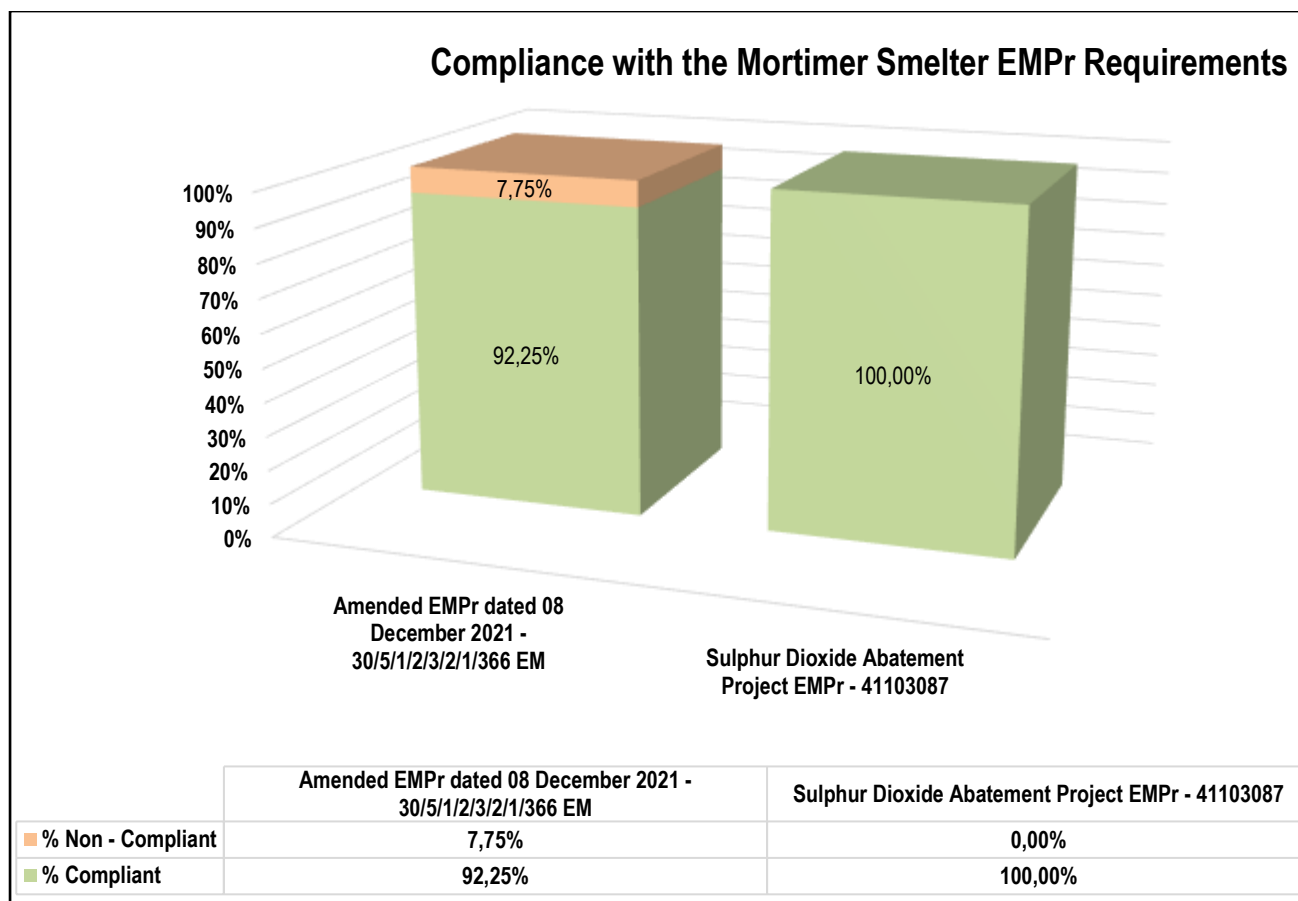


Figure 1: Mortimer Smelter Compliance Audit Percentage Summary

AUDIT CONCLUSION

The environmental audit conducted at Mortimer Smelter concluded that the operation aims to achieve compliance with the requirements outlined in the EMPr. While there were a few instances of lesser compliance, they can be addressed with management input.

The audit also confirmed that the revised EMPr, approved in December 2021, is effective in providing measures to manage and mitigate environmental impacts.

Mortimer Smelter amended EMPr of 08 December 2021 (30/5/1/2/3/2/1/366 EM)

The auditor found that Mortimer Smelter has demonstrated a strong commitment to environmental stewardship and compliance, particularly through the implementation of ISO 14001:2015 EMS. The smelter has implemented commendable practices in areas such as water management, waste management, and community relations. Some areas, including the management of clean and dirty water systems and groundwater quality exceedances, require attention and improvement.

Mortimer Smelter Sulphur Dioxide Abatement Project EMPr of November 2021 (41103087).

The auditor found that the Mortimer Smelter Sulphur Dioxide project has been postponed indefinitely and no current construction or operational activities are taking place at the site. The construction contractor has decamped from the facility, and the only facility that was observed to be completed at the time of the audit was the cement surface for the plant and the associated stormwater infrastructure.

The audit findings provide valuable insights for enhancing environmental management practices and ensuring sustainable operations. It is recommended that Mortimer Smelter continues to monitor performance, implement improvements, and maintain compliance with regulations. Overall, the audit confirms the smelter's commitment to environmental responsibility and the effectiveness of the current EMPr's in managing environmental impacts. The findings will guide further improvements and actions to ensure ongoing compliance and continuous environmental performance and improvement.

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	Originated By	Internal Review	Technical Review
Name	Kevin James Bushell	Mathew Barends	Dawid Smith
Designation	Environmental Auditor	Environmental Auditor	Environmental Auditor
Signature			
Date	29-10-2025	29-10-2025	29-10-2025
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DECLARATION OF ENVIRONMENTAL AUDITOR

I, Kevin James Bushell, as representative of Environmental Assurance declare that;

- I act as an independent auditor;
- I perform all work relating, including the audit in an objective, independent manner, even if this results in views and findings that are not favourable to the Holder;
- There are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the environmental audits relevant to this submission, including knowledge of the Act, Regulations and any guidelines that have relevance to the activity;
- I will comply with the Act, Regulations and relevant legislation;
- I have not, and will not engage in, conflicting interests in the undertaking of the audit;
- I undertake to disclose to the applicant/ Environmental Assessment Practitioner appointed by applicant and the competent authority of all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the activity by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct.



Signature of the Environmental Auditor:

Environmental Auditor	Relevant expertise
Kevin James Bushell Environmental Auditor	Kevin James Bushell joined ENVASS in January of 2018. He holds a B.Sc. (Environmental Management) degree from the University of South Africa and has over 10 years of experience in environmental compliance auditing and monitoring, ISO 14001 and ISO 45001 requirements and implementation, and is BSI / IRCA ISO 14001 Lead Auditor trained. He has practical experience relating mining, construction, waste, water and power distribution infrastructure.

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DEFINITION OF TERMS

Please note that the table of definitions and terms referred to do not apply to the wording of the commitments or management objectives as extracted from the relevant EMP, however, relates to the terms and words used by the Auditor in relation to the findings in the Audit Report.

TERM	DESCRIPTION
Audit:	A systematic, independent and documented review by a suitably, qualified professional(s) of operations and practises to verify the status of relevant requirements.
Audit Criteria:	The set of policies, procedures, or requirements used as a reference during an audit.
Audit Evidence / Proof:	Records, statements of fact, or other information that is relevant to the audit criteria and verifiable.
Audit Findings:	Results of the evaluation of the collected audit evidence against audit criteria. Audit findings can indicate either conformity or non-conformity with audit criteria.
Disposal	The burial, deposit, discharge, abandoning, dumping, placing or release of waste into or onto any land.
Emergency	An unexpected sudden occurrence, including a major emission, fire or explosion leading to serious danger to the public or potentially serious pollution of or detriment to the environment, whether immediate or delayed.
Environmental Audit	A systematic, documented verification process of objectively obtaining and evaluating evidence to determine whether specified environmental activities, events, conditions, management systems, or information about these matters conform with audit criteria, and communicating the results of this process to the client.
Environmental Component / Aspect	An attribute or constituent of the environment (i.e., air quality; marine water; waste management; geology, seismicity, soil, and groundwater; marine ecology; terrestrial ecology, noise, traffic, socio-economic) that may be impacted by the proposed project.
Environmental Impact:	A positive or negative condition that occurs to an environmental component as a result of the activity of a project or facility. This impact can be directly or indirectly caused by the activity.
Environmental Management Plan / Programme:	A site-, project-, or facility-specific plan developed to ensure that environmental management practises to eliminate and control environmental impacts are followed during Commissioning and Operation phases.
General Waste	Waste that does not pose an immediate threat or hazard to health or the environment and includes: Domestic waste; Building and demolition waste; Business waste; and Inert waste.
Hazard	The potential of a mine abandoned deposit to cause harm as a consequence of failure.
Hazardous Waste	Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have detrimental impact on health and the environment.

TERM	DESCRIPTION
Impact	A description of the potential effect or consequence of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.
Infrastructure	The network of facilities and services that are needed for economic activities, e.g. roads, electricity, water, sewerage, etc.
Mitigation	Measures designed to avoid, reduce or remedy adverse impacts.
Operation(s)	The time period that corresponds to any event, process, or activity that occurs during the Operation (i.e., fully functioning) phase of the proposed project or development. (The Operation phase follows the Construction phase, and then terminates when the project or development goes into the Decommissioning phase.)
Recycle	A process where waste or waste water is reclaimed for further use, this process involves the separation of waste from a waste stream for further use and the processing of that separated materials as a product or raw material.
Re-use	To utilise articles from the waste or water again for a similar or different purpose without changing the form or properties of the articles.
Storage	The accumulation of waste in a manner that does not constitute a treatment or disposal of that waste.
Waste	Any substance, whether or not that substance can be reduced, re-used or recycled and recovered- That is surplus, unwanted, rejected, discarded, abandoned or disposed of; Which the generator has no further use of for the purposes of production; That must be treated or disposed of; That is identified as waste by the Minister by notice in the Gazette and includes waste generated by the mining, medical or other sector, but- A by-product is not considered waste Any portion of waste, once reused, recycled and recovered, ceases to be waste.
Waste Management	Classifying, recycling, treatment and disposal of waste generated during construction, operation and decommissioning activities.

LIST OF ACRONYMS

ACRONYM	DESCRIPTION
AAP	Anglo American Platinum Limited
CP	Converter Plant
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
DMPR	Department of Mineral and Petroleum Resources
EMPr / EMP / EM Plan	Environmental Management Programme / Environmental Management Plan
ENVASS	Environmental Assurance (Pty) Ltd
ESM	Environmental Site Manager
EMV	Earth Moving Vehicles
EIA	Environmental Impact Assessment
EA	Environmental Authorisation
ESP	Electrostatic Precipitators
IWWMP	Integrated Waste Water Management Plan
LOM	Life of Mine
MPRDA	Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)
MRD	Mine Residue Dump
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998) (as amended)
NEM:AQA	National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (as amended)
NEM:BA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NEM:WA	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (as amended)
NWA	National Water Act, 1998 (Act No. 36 of 1998) (as amended)
PGM	Platinum Group Metal
PM	Project Manager
PMR	Precious Metals Refinery
BMR	Base Metals Refiners
RPM	Rustenburg Platinum Mines
RPM-US	Rustenburg Platinum Mines: Union Section
SDS	Safety Data Sheets
SLP	Social Labour Plan

ACRONYM	DESCRIPTION
SHEQ	Safety, Health, Environment and Quality

CHAPTER 1: INTRODUCTION AND PROJECT BACKGROUND

1.1. INTRODUCTION

Environmental Assurance (Pty) Ltd. (hereafter referred to as ENVASS), represented by an independent environmental auditor, was appointed by Rustenburg Platinum Mines Limited (RPM), a subsidiary of Valterra Platinum: Mortimer Smelter (hereafter referred to as “Mortimer Smelter”) to undertake the environmental compliance audit of the Environmental Management Programme (EMPr) (File No: 30/5/1/2/3/2/1/366 EM) for the 2024 to 2025 period, in accordance with the requirements as set in the Environmental Impact Assessment (EIA) regulations.

A Regulation 34 environmental audit was conducted on the 11th of September 2025 to assess the compliance and continued appropriateness/adequacy of the EMPr (Section 24 Q of National Environmental Management Act (NEMA)) at Mortimer Smelter. The EMPr must be assessed for compliance as well as for its ability to prevent, manage and mitigate environmental impacts caused by the activities undertaken. This report aimed to assess the compliance and continued appropriateness/adequacy of the EMPr (Section 24 Q of NEMA).

1.2. FACILITY DESCRIPTION

Rustenburg Platinum Mines, a subsidiary of Valterra Platinum: Mortimer Smelter is located within the north-western limb of the Bushveld Complex, with the main objective to process wet concentrate from Ivan and Mortimer Concentrators to produce crushed, slow-cooled, sulphur-deficient nickel-copper matte rich in Platinum Group Metals (PGM's), gold, and base metals for despatch to Rustenburg Platinum Mines: Union Section (RPM-US) for further processing within the Rustenburg Base Metals Refiners (RBMR) and Precious Metals Refinery (PMR). It should be noted that Mortimer Smelter originally formed part of the Union Mine (Siyanda Bakgatla) but has recently been excised from the mining complex, and at the time of the audit, the facility has been in “Care and Maintenance” as from April 2024.

The wet concentrate from the concentrators is delivered to the Mortimer Smelter which is then dried, melted and crushed to form a dry furnace matte. Slag generated from the smelting process is sent to the Mortimer Slag Concentrator where it is reprocessed before being reintroduced into the Mortimer Smelter. Slag that cannot be utilised is deposited onto a slag stockpile. The matte produced by the furnace is tapped periodically, cast to silica sand moulds and crushed to produce a fine product that is suitable for lance injection into the Converter Plant (CP) converters.

This fine matte is transferred to the CP location at the Waterval site in bulk tankers and off-loaded at that site into the RPM-US Furnace Matte (FM) storage facility. The furnace slag is tapped from the furnace, granulated, de-watered and transferred to the slag mill. If the slag mill is not available, slag is stored on the slag dump.

The smelter comprises of 6-in-line electric 38 MWa furnaces with a smelting capacity of 360 000 tons per annum. Dry material from the concentrators is transferred pneumatically from 1000 ton silos into two 18 ton furnace feed bins from where it is fed to the furnaces for smelting. The furnace produces a sulphide matte, which is tapped into 19 ton matte ladles, cast into silica moulds, cooled and then crushed. The Mortimer Smelter facility includes a furnace off-gas dust cleaning section with electrostatic precipitators (ESPs) after which the off-gas is routed to the stack.

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The following products are produced from the Mortimer Smelter:

- The matte, which has a high concentration of metal values (Nickel, Copper, Cobalt and PGMs) all in sulphide and/or alloy form, has a relatively high density and collects at the bottom of the furnace;
- The slag, which consists mainly of gangue such as Silica, Magnesium oxide and Iron oxides, is less dense and floats on top of the matte;
- Typical pay base metal elements <0.2% with PGMs less than 1.5 grams per tonne (g/t) slag; and
- The off-gas consists of process gasses, dilution air and flue dust.

As of writing this audit report, a plan is in place to convert the furnace at Mortimer Smelter, from a Primary Smelting Furnace to a Slag Cleaning Furnace in 2026. A final BAR has been submitted to NWEDEDECT for their review and approval of the conversion and after which date the furnace will become operational again.

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Figure 2: Locality Map of Mortimer Smelter

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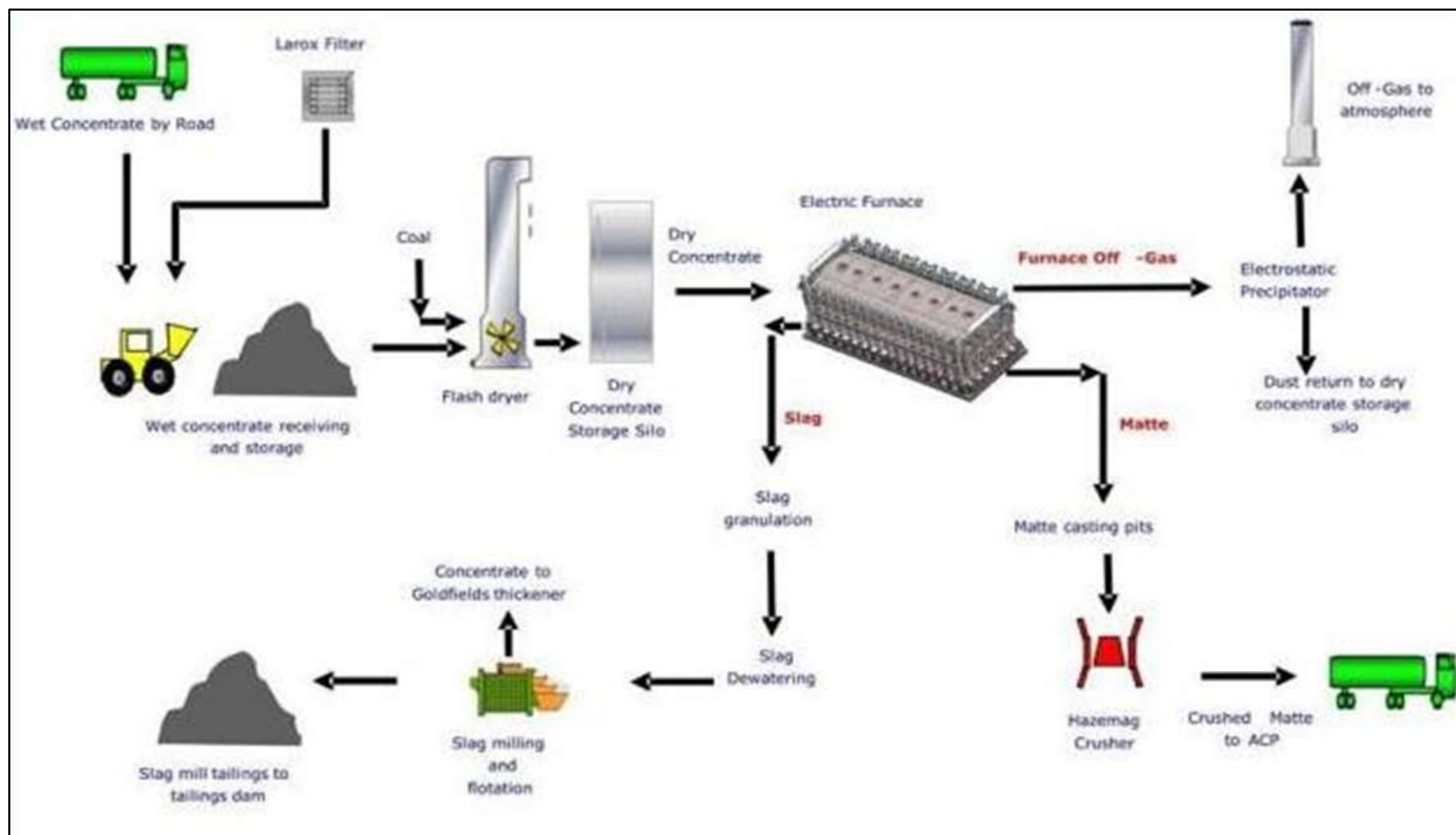


Figure 3: Process flow of the Mortimer Smelter (retrieved from EMPr, WPS Arsons Brinkerhoff)

1.3. AUDIT CRITERIA REFERENCE

Table 2: Audit Particulars

AUDIT PARTICULARS	
Project title:	Regulation 34 Environmental Audit for Rustenburg Platinum Mines Limited (RPM), a subsidiary of Valterra Platinum: Mortimer Smelter
EMPr References	Amended EMPr dated 2021. Rustenburg Platinum Mines Limited: Mortimer Smelter EMPr 30/5/1/2/3/2/1/366 EM
	Approved EMPr dated 2021. Rustenburg Platinum Mines Limited: Mortimer Smelter EMPr 30/5/1/2/3/2/1/366 EM
EMPr Titles	Rustenburg Platinum Mines Limited: Mortimer Smelter EMPr
	Mortimer Smelter Sulphur Dioxide Abatement Project Environmental Management Programme
Project area:	Turfbult 404 KQ
Contact person (Activity):	Claudette Kruger
Auditor:	Kevin James Bushell

CHAPTER 2: SCOPE, OBJECTIVES, CRITERIA AND METHODOLOGY

The Environmental Impact Assessment Regulations of 2014 (as amended), Regulation 34 compliance audit is a 'systematic, independent and documented process of obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled' (ISO 19011:2018). This compliance audit was conducted in line with the criteria outlined within the approved EMPr, EA's etc as well as the EIA Regulations 2014 (as amended) Regulation 34.

The results of this compliance audit aim to determine the adequacy and relevance of *inter alia*; the environmental management measures. It is important to note that a requirement of an environmental audit is that evidence must be supported by verifiable evidence.

The audit methodology later explained in this report, is based on a parallel documentation review and site compliance (visual confirmation) assessment process. In addition, interviews were held with site personnel to gain insight into key operational processes and the alignment of these with the actual compliance requirements as captured in the audit checklist.

2.1. SCOPE

To have conducted a compliance audit in terms of Regulations 34 of the EIA Regulations of 2014 (as amended). The independent external audit report will identify the level of compliance to the Mortimer Smelter EMPrs' requirements by undertaking a site assessment, conducting interviews with management and employees and reviewing legal and other documentation.

Observations are used to evaluate current environmental management and mitigation measures on-site and determine whether these are aligned and in accordance with the requirements and commitments within the EMPr and relevant environmental legislation whilst assessing whether the prescribed measures in the EMPr are indeed applicable and adequate.

The environmental audit was undertaken by one (1) independent auditor representing ENVASS, reporting toward the intended outcome of Regulation 34, Sub regulation 2 through:

- Provision of verifiable findings in a structured and systematic manner on:
 - Level of performance against and compliance with the provisions of the EMPr.
 - The Amended EMPr of 2021 (approved with reference No: 30/5/1/2/3/2/1/366 EM).
 - Level of performance against and compliance with the provisions of the EMPr.
 - The Approved EMPr of 2021.
- The ability of the measures contained in the EMPr's to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaken of the activity.

This audit did not include requirements relating to the identification of new impacts not authorised in the EMPr.

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2.2. OBJECTIVE

The main objectives of the environmental audit report were to compile an audit report for the site which can be submitted to the relevant Governmental Departments, indicating, and reflecting the current performance of the said operational activities against the EMPr as well as to measure the adequacy of the EMPr in relation to operational activities and the known and associated impacts. The objectives therefore include *inter alia*:

- An assessment of the company's commitment and adherence to the conditions set out in the EMPr.
- Ensuring compliance with regulatory authority stipulations which may be local, national and/or international.
- Verifying environmental performance through information on impacts as they occur.
- Assess whether the EMPr is still aligned with existing environmental legislation.
- Responding to unforeseen events.
- Providing feedback for continual improvement in environmental performance; and
- Providing verifiable findings, in a structural and systematic manner.

2.3. STRUCTURE OF THE AUDIT

Environmental Impact Assessment Regulations, 2014 read with Appendix 7

- (a) details of –
 - (i) the independent person who prepared the environmental audit report; and
 - (ii) the expertise of independent person that compiled the environmental audit report;
- (b) a declaration that the independent auditor is independent in a form as may be specified by the competent authority.
- (c) an indication of the scope of, and the purpose for which, the environmental audit report was prepared;
- (d) a description of the methodology adopted in preparing the environmental audit report;
- (e) an indication of the ability of the EMPr to-
 - (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;
- (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the facility;
- (iii) ensure compliance with the provisions of the EMPr;
- (f) a description of any assumptions made, and any uncertainties or gaps in knowledge;
- (g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;
- (j) a summary and copies of any comments that were received during any consultation process; and
- (k) any other information requested by the competent authority.

2.4. METHODOLOGY

In line with the requirements of NEMA, the audit report aims to identify findings associated with either insufficient mitigation measures or an unsatisfactory level of compliance with the EMPr requirements. The recommendations, where required, will

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be prepared by the auditee / holder and submitted to the competent authority in terms of Regulation 34(4) of the EIA Regulations of 2014 (as amended), which will provide the basis upon which EMPr amendments are done.

In order to ensure that all aspects of the regulation are addressed, the following are clarified and confirmed during the opening meeting of the environmental audit.

- Define verifiable findings;
- Confirm Regulation 34 approach to:
 - Performance approach against the EMPr;
 - How adequacy of measures will be assessed in the EMPr;
 - Acceptance of definitions relating to compliance (NC, C, N & UD); and
 - The method used to test the EMPr measures implemented.

This 2025 Mortimer Smelter Regulation 34 compliance audit report was prepared by ENVASS, drawing on the following sources of information”.

- Rustenburg Platinum Mines Limited: Mortimer Smelter EMPr (as amended in 2021).
- Mortimer Smelter Sulphur Dioxide Abatement Project Environmental Management Programme.
- A site assessment and facility inspections.
- Discussions with relevant role players; and
- Inspection of records and documentation pertaining to the operations at the Mortimer Smelter Operation.

Observations and findings were made during a one-day visit to Mortimer Smelter Operation, undertaken by one ENVASS consultant on the 11th of September 2025. This visit was conducted specifically for the purpose of auditing the compliance against the requirements within the EMPr. Each condition was rated in terms of compliance by using the audit rating criteria below:

Table 3: Rating Criteria

Rating	Criteria
Compliance (C):	Mortimer Smelter has fulfilled all requirements relevant to the management measure as stipulated in the EMPr.
Non-compliance (NC):	The management measures have not been complied with as set out in the EMPr.
Noted (N)	No management measure has been set or requirements stipulated.
Undetermined (UD):	Compliance with the management measure as set out in the EMPr cannot be determined.
<i>It is however important to note that although every effort is put into conducting a thorough audit, due to the time constraints for an audit, or the nature of activities viewed on the day of the audit, only a sample of the operations can be reasonably assessed.</i>	

The table below provides detail of the audit with regards to the scheduling and planning of the audit.

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Table 4: Audit information

Audit Information	
Audit period:	2024 - 2025
Audit schedule compiled on:	11 th September 2025
Audit team:	Mr. Kevin James Bushell – Auditor
Audit language:	English
Reference documents:	Amended EMPr dated 08 December 2021 Rustenburg Platinum Mines Limited: Mortimer Smelter EMPr 30/5/1/2/3/2/1/366 EM
	EMPr dated November 2021 Mortimer Smelter Sulphur Dioxide Abatement Project Environmental Management Programme NW30/5/112/312/11366EM-3
Location:	Mortimer Smelter Operations

The audit team was comprised of one auditor from ENVASS:

Table 5: Audit Team

Auditor	Background
Kevin James Bushell	Kevin James Bushell joined ENVASS in January of 2018. He holds a B.Sc. (Environmental Management) degree from the University of South Africa and has over 10 years of experience in environmental compliance auditing and monitoring, ISO 14001 and ISO 45001 requirements and implementation, and is BSI / IRCA ISO 14001 Lead Auditor trained. He has practical experience relating mining, construction, waste, water and power distribution infrastructure.

2.5. DELIVERABLES

A report is required in the structure set by Regulation 34 read with Appendix 7 which will have assessed:

- Performance to and compliance with the EMPr, and
- Adequacy of the measures in the EMPr.

CHAPTER 3: AUDIT FINDINGS

3.1. AUDIT FINDINGS

From the site assessment, documentation review and discussions with relevant personnel, the overall compliance for Mortimer Smelter to the relevant conditions of the Amended EMPr is summarised in Table 6 and can be read with the respective Appendices:

- Annexure A: Collated audit checklists.
- Annexure B: Documented Evidence References

Table 6: Overall compliance summary

Mortimer Smelter 2025 Regulation 34 Audit						
EMPr Reference	Undetermined / Noted	Compliant	% Compliant	Non - Compliant	% Non - Compliant	Total
	N/A	C	C %	NC	NC%	Total
Amended EMPr dated 08 December 2021 - 30/5/1/2/3/2/1/366 EM	56	119	92,25%	10	7,75%	129
Sulphur Dioxide Abatement Project EMPr - 41103087	98	34	100,00%	0	0%	34

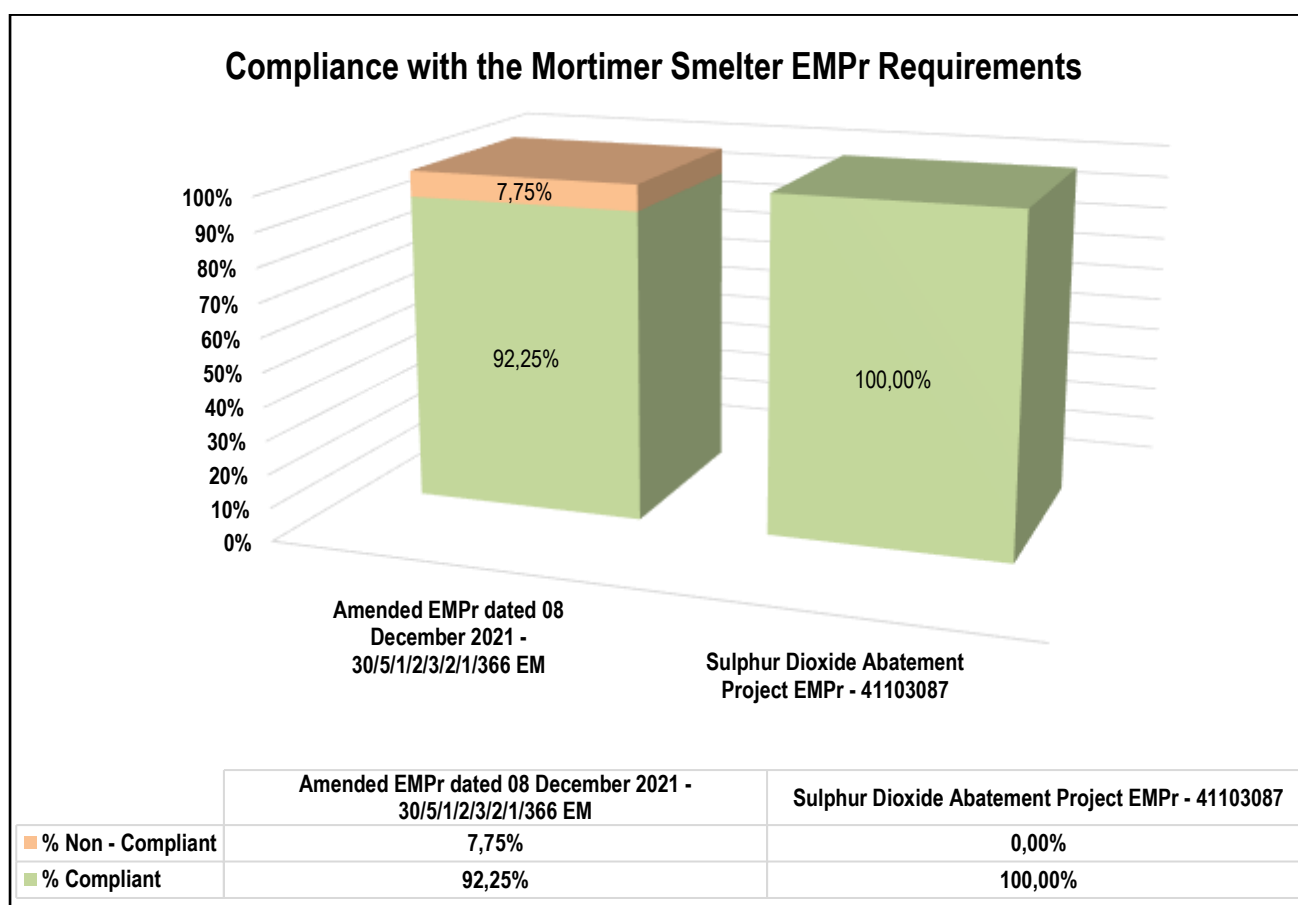


Figure 4: Compliance Summary

CHAPTER 4: CONCLUSION AND RECOMMENDATIONS

4.1. ASSESSMENT FINDINGS

A compliance rating of 92,25% and 100,00% were recorded for Mortimer Smelter in terms of the approved EMPr's as detailed in Table 6. Mortimer Smelter should aim to achieve maximum compliance with the approved EMPr to ensure minimal impacts to the environment throughout the operational life cycle.

4.2. COMPLIANCE TO THE EMPr'S

Mortimer Smelter amended EMPr of 08 December 2021 (30/5/1/2/3/2/1/366 EM)

In achieving the 92,25% compliance of the Amended EMPr (2021); a total of 129 applicable commitments were assessed of which 119 are complying and 10 non-compliances are recorded. It should be noted that a total of 56 commitments could not be assessed, which remains undetermined or for noting.

Mortimer Smelter Sulphur Dioxide Abatement Project EMPr of November 2021 (41103087).

In achieving the 100,00% compliance of the Sulphur Dioxide Abatement Project EMPr; a total of 34 applicable commitments were assessed of which 34 are complying and 0 non-compliances are recorded. It should be noted that a total of 102 commitments could not be assessed due to the postponement of the project, which remains undetermined or for noting.

4.3. AUDIT CONCLUSION

The environmental audit conducted at Mortimer Smelter comprehensively assessed the operation's environmental performance, compliance with applicable legislation, and adherence to management measures as prescribed within the commitments of the two approved EMPrs, namely the Mortimer Smelter amended EMPr of 08 December 2021 (Ref. 30/5/1/2/3/2/1/366 EM) and the Sulphur Dioxide Abatement Project EMPr of November 2021 (Ref. 41103087). The audit encompassed key operational aspects including environmental management systems, water management, air quality, waste management, occupational health and safety, and community engagement.

Overall, Mortimer Smelter has demonstrated a strong commitment to environmental stewardship and regulatory compliance. The implementation of the ISO 14001:2015 Environmental Management System (EMS) continues to provide a robust and systematic framework for identifying, managing, and mitigating environmental impacts, while supporting continual improvement across operational areas.

Several commendable practices were observed throughout the audit process. These include the implementation of comprehensive monitoring programmes for water quality, air emissions, and noise levels, all of which were found to be within the required regulatory thresholds. The smelter also maintains responsible water management practices, such as operating a closed-loop water system, conducting regular groundwater monitoring, and implementing water balance assessments. These initiatives collectively demonstrate Mortimer Smelter's commitment to conserving water resources and minimising its impact on surrounding hydrological systems. In addition, effective waste management and housekeeping practices were evident, including proper storage and handling

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of hazardous materials and regular inspection and maintenance of containment systems to prevent leaks and spills. From a stakeholder perspective, Mortimer Smelter has continued to promote transparency and engagement through its community awareness programmes and responsive communication channels.

However, the audit identified several non-conformances requiring management attention and corrective action across both EMPs:

- Within the Mortimer Smelter amended EMP (2021), non-compliances were largely infrastructure and water-management related, including:
 - Blocked and damaged stormwater trenches and drains, with limited evidence of inspection and cleaning;
 - Incomplete separation of clean and dirty water systems as per GN 704 of the National Water Act, with certain areas lacking suitable stormwater collection structures;
 - Absence of installed seepage control systems such as perimeter or toe drains at the slag dump;
 - Delayed implementation of the 2021 project to redesign water management infrastructure and control seepage from the Fraser Dam; and
 - Occasional oil spills that were not promptly neutralised, potentially leading to contamination of the closed-loop water system.

These findings indicate that while operational controls are in place, implementation and maintenance of certain water and stormwater infrastructure remain areas of vulnerability that may contribute to potential groundwater or surface water contamination if unaddressed.

- Under the Sulphur Dioxide Abatement Project EMP (November 2021), no non-conformances were identified due to the fact that the activity has been postponed indefinitely and thus much of the conditions could not be assessed.

Despite these identified gaps, Mortimer Smelter has made significant progress toward maintaining regulatory compliance, improving its environmental performance, and embedding sustainable operational practices. The smelter continues to demonstrate commitment to the implementation of corrective and preventative measures, particularly through feasibility studies, infrastructure redesign initiatives, and internal monitoring mechanisms.

The 2025 external audit process determined that the Mortimer Smelter EMP (December 2021) remains effective in providing for the avoidance, management, and mitigation of environmental impacts associated with operations and is being implemented by Mortimer Smelter. Similarly, the Sulphur Dioxide Abatement Project EMP (November 2021) was found to be applicable and relevant to the associated project activities.

The independent auditor is of the opinion that both EMPs, in their current form, are adequate and effective frameworks for managing identified environmental aspects and impacts, provided that the highlighted non-conformances are addressed within agreed timeframes.

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The findings and recommendations arising from this audit should serve as a roadmap for continuous improvement, enabling Mortimer Smelter to maintain compliance, strengthen its environmental and safety management systems, and support the long-term sustainability of its operations.

ANNEXURE A: CHECKLIST

4.1. ENVIRONMENTAL MANAGEMENT PROGRAMMES

Table 7: Amended EMPr dated 08 December 2021 - 30/5/1/2/3/2/1/366 EM

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Table 8-1: Environmental Management General Commitments							
Legal Requirements							
The following Acts are applicable and relevant to the said approval and RPM-US is to familiarize itself with it's provisions in so far as they apply to the operations:	Construction/Operational/ Closure/Post Closure			X		This condition was reviewed in relation to the Acts referenced in the specific requirements. It is noted that evaluation of compliance with these Acts falls outside the scope of the Regulation 34 Audit.	
- The National Water Act (No. 36 of 1998), with particular reference to the sections pertaining to operations in the proximity of dams and their catchments areas, rivers, marshes, streams, pans and other water courses			X			Mortimer Smelter holds a valid Integrated Water Use Licence for activities under Section 21 (c), (i) and (g) water uses.	Document 1
- The Environmental Conservation Act (No. 73 of 1989). Your attention is specifically directed to the requirements of section 20 of the above-mentioned Act.			X			The Environment Conservation Act has largely been repealed, with waste-related provisions replaced by the National Environmental Management: Waste Act 59 of 2008, which now governs waste management.	Document 2
- The National Environmental Air Quality Act (No. 39 of 2004), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by activities into the atmosphere			X			Mortimer Smelter holds a renewed Atmospheric Emission Licence (AEL) (BPDM/MORTIMDERAEL/SEPTEMBER2020) issued on 27 August 2020. The Smelter conducts dust-fallout, ambient-air and stack monitoring to maintain compliance with	Document 3 - 5

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						the National Environmental Management: Air Quality Act (No. 39 of 2004).	
- The National Environmental Waste Management Act (No. 57 of 2009).			X			Mortimer Smelter is registered with the National Environmental Management: Waste Act as a hazardous-waste generator. All waste is managed in accordance with legislative requirements. A licensed service provider is appointed for on-site waste management, and records of disposal volumes are maintained as required by law.	Document 2, 6 - 8
- The Conservation of Agriculture Resources Act (No. 43 of 1983), with particular reference to the sections pertaining to soil conservation.			X			Mortimer Smelter operates entirely within an industrial footprint with no natural areas present. Pollution-prevention measures are implemented, including incident investigation, non-conformity management and corrective actions. Spill kits and response procedures are in place. The Annual Rehabilitation and Decommissioning Plan (SRK Consulting, 2023) provides for rehabilitation of disturbed areas to achieve final end-use objectives.	Document 9, 10, 11 Picture 1 - 2
- The National Heritage Resources Act (No. 25 of 1999), with particular reference to the protection of all historical and pre- historical cultural remains.			X			Ms Thato Moraope, Environmental Officer, confirmed that no archaeological or heritage remains have been identified at Mortimer Smelter. The Archaeology and Cultural Study (Stevens et al., 2007) included in the updated EMPr indicates that no heritage resources are present within the site boundary.	Document 12
The National Environmental Management Act (No. 107 of 1998).			X			Mortimer Smelter operates an Environmental Management System (EMS) aligned with NEMA and maintains an	Document 12

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						authorised Environmental Management Plan (amended in 2021 under Regulation 35 of the NEMA EIA Regulations).	
A copy of the Environmental Management Programme must always be available on site.	Construction/Operational/ Closure/Post Closure		X			A copy of the EMPr was available for review during the site inspection in both hardcopy form and electronically via the Platinum Way Online System.	Document 12
Any project, expansions or additional infrastructure must be addressed through an amendment and submitted to the Regional Manager for the approval, before they commence. This approval may be amended at any stage if deemed necessary.	Construction/Operational/ Closure/Post Closure		X			At the time of audit, no unapproved projects, expansions or construction activities were noted. Mortimer Smelter demonstrated compliance with mitigation measures, and the SO ₂ abatement plant was approved under a separate EMPr.	
This approval does not purport to absolve the Smelter from its common law obligations towards the surface rights holder or any other affected party.	Construction/Operational/ Closure/Post Closure			X		Noted. Mortimer Smelter acknowledged the condition.	
All persons concerned must be made fully conversant with the terms of this approval, copies of which must be readily available to them.	Construction/Operational/ Closure/Post Closure		X			Communication of EMPr commitments and management measures were effectively implemented through training and awareness programmes in accordance with the company's Training, Awareness and Competency Procedure. Evidence of awareness was observed across all employment levels through initiatives such as Monthly Talk Topics. Copies of the EMPr are available at the SHEQ offices and electronically on the Online Documentation System.	Document 12, 14 - 16
General Management							

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Ensure that contractors and staff are well managed and adhere to the mitigation and management measures stipulated in this report.	Construction/Operational/ Closure/Post Closure		X			Mortimer Smelter conducted monthly discussions on environmental awareness to promote the preservation of natural resources and improve understanding of environmental aspects, impacts and site protocols. SHE Monthly Talk Topics were distributed across the operation to educate employees and contractors on EMPr requirements. Environmental signage was displayed throughout the facility to reinforce the company's environmental objectives.	Document 12, 14 – 15
All vehicles and equipment must be regularly maintained to ensure their integrity and reliability. No vehicle repairs are to be undertaken at Mortimer Smelter.	Construction/Operational/ Closure		X			During the audit, equipment at the Smelter was found to be well maintained and in good working order. Discussions with personnel confirmed that regular servicing and maintenance were undertaken to maintain reliability and integrity. No vehicle repair activities were observed at the Smelter.	Document 33
All surface infrastructure must be maintained. This involves the regular cleaning of trenches, piping etc.	Construction/Operational/ Closure	X				The surface infrastructure was generally maintained in good condition; however, blocked and damaged trenches were observed during the audit. Although a procedure for the inspection and cleaning of trenches was presented, evidence of its implementation was not noted.	Document 17, 18 Picture 3 - 7
All hazardous substances must be stored on an impervious surface in a designated bunded area, able to contain 110 % of the total volume of materials stored at any given time. Storage areas must be well marked with appropriate signage. Wash down water from bunded areas must be diverted into oil traps.	Construction/Operational/ Closure		X			The hazardous storage areas, including the Paint Store, Hazardous Waste Store and Diesel Storage Tank, had impermeable surfaces within bunded areas capable of containing 110 % of the stored volume. These areas were clearly demarcated and equipped with appropriate signage.	Picture 11 - 16

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Employees must be issued with appropriate PPE.	Construction/Operational/ Closure		X			During the assessment, all site employees were provided with appropriate Personal Protective Equipment (PPE), and records of issued PPE were available for review. The auditor was equipped with the required PPE for the site inspection.	Picture 17
Adherence to the Smelters Environmental policy, Environmental procedures and values must be included in any construction contracts, thereby making contractors accountable.	Construction/Operational/ Closure				X	Construction activities were not undertaken at the time of assessment; therefore, this condition was considered undetermined.	
Good housekeeping practices must be implemented and maintained by the Smelter and its contractors.	Construction/Operational/ Closure		X			Good housekeeping practices were maintained during the audit. No litter was observed, and materials, tools and equipment were neatly stored without presenting hazards.	Picture 18, 19
Should any archaeological artefacts be exposed during prospecting, activities in the vicinity of findings must be stopped immediately. Under no circumstances shall any artefact be destroyed. Such an archaeological site must be marked and fenced off, and the South African Heritage Agency must be contacted immediately.	Construction/Operational			X		Representatives from Mortimer Smelter acknowledged compliance obligations relating to archaeological discoveries. The Archaeology and Cultural Study (Stevens et al., 2007) documented in the EMPr confirmed that no archaeological sites or artefacts were present within the operational area.	Document 12
Ensure that all site disturbances are limited to areas where structures will be constructed / removed.	Construction/Closure		X			The review of site plans confirmed that disturbance was limited to areas necessary for operational activities. Decommissioning and closure activities were not anticipated in the foreseeable future and would be evaluated at the appropriate stage if required.	Document 11, 20

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The rehabilitation fund must be upgraded or revised on an annual basis according to the surveyed plan, which indicates the progress in rehabilitation.	Operational		X			Mortimer Smelter appointed SRK Consulting to update the Rehabilitation, Decommissioning and Closure Plan (including cost calculations) on an annual basis, with the latest revision completed in December 2023. Decommissioning and closure activities, including rehabilitation, were not anticipated in the near future.	Document 11
The contractors must be responsible for the maintenance of the chemical toilets.	Construction				X	The construction phase had been completed, and chemical toilets were no longer required at the operation. Assessment of compliance with this mitigation measure was not applicable during the audit.	
The Smelter closure objectives must be adhered to.	Closure				X	No immediate actions were specified for the operational phase under this condition.	
Suitable accommodation and security must be provided for employees during construction.	Construction				X	The construction phase had been completed, and chemical toilets were no longer necessary. As such, compliance with the mitigation measure could not be assessed, as it was not applicable during the audit.	
Environmental conditions must be included in any construction contracts, thereby making contractors accountable for preventing accidental spillages by the implementation of an Environmental Management System (EMS).	Construction				X	The construction phase had been completed, and chemical toilets were no longer required at the operation. Assessment of compliance with this mitigation measure was not applicable during the audit.	
Soil Management							

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The disturbed areas must be rehabilitated to wilderness potential	Construction/Operational/ Closure/Post Closure		X			In line with the updated Rehabilitation, Decommissioning and Closure Plan (SRK Consulting, 2023), disturbed land would be rehabilitated to achieve a wilderness end-land use.	Document 11
All excavations must be backfilled to the natural surface level; if a bulk factor exists it must be accommodated on the total area of disturbance	Construction/Operational/ Closure		X			No excavations were observed during the site assessment, and all historical construction excavations had been adequately backfilled.	
If deemed necessary, during rehabilitation, appropriate erosion control structures such as agricultural type contour drains must be provided	Construction/Operational/ Closure			X		Mortimer Smelter acknowledged the condition requirements and committed to implementation when required.	
Following construction, exposed areas must be rehabilitated with topsoil / subsoil and re-vegetated	Construction/Operational		X			No exposed areas were identified during the assessment. Construction activities had been completed, and all previously disturbed areas requiring rehabilitation had been restored.	
Topsoil must only be exposed for minimal periods and adequately stockpiled to prevent topsoil loss and run-off. Vegetation clearance must be conducted in phases to reduce the exposed area	Construction/Closure				X	Discussions with site personnel and field observations confirmed that no historical topsoil stockpiles were present. Compliance with mitigation measures relating to topsoil management was therefore considered undetermined, as no applicable evidence could be assessed during the audit.	
Sustainable erosion control measures (for wind and water erosion) must be implemented and maintained where necessary in areas disturbed by the construction / demolition operations	Construction/Closure				X	The construction phase at Mortimer Smelter had been completed. Compliance with mitigation measures related to construction was considered undetermined, as there were no applicable activities to assess during the audit. Closure activities had not yet commenced and would be evaluated during the appropriate closure phase.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Stockpiles created during the construction phase must not remain in the operation phase of the project	Construction/Operational		X			No historical construction stockpiles were observed during the site assessment.	
All available topsoil must be stripped and stockpiled separately prior to any surface disturbance	Construction				X	The assessment confirmed that no topsoil stockpiles were present at Mortimer Smelter. As construction had been completed, compliance with related mitigation measures was considered undetermined due to the absence of applicable activities during the audit.	
Topsoil must be kept separate from sub-soil and not be used for building purposes, maintenance or access roads.	Construction				X		
All topsoil from the contractor lay down area must be stripped, removed, stockpiled (as per stockpile storage guidelines) and re-used to preserve its integrity and seed reserve. Topsoil must be used to rehabilitate disturbed areas	Construction				X		
Soil must be stripped and stockpiled by means of end-tipping or dozing to avoid compaction	Construction				X		
The topsoil and subsoil must not be stored separately, due to their relatively homogenous structure and texture from the surface through the profile	Construction				X		
A minimum layer of 500 mm of topsoil must be re-established	Construction				X		
Topsoil depth must be governed by the post-closure land capability. A greater depth of topsoil is required for rehabilitation to arable standard than for grazing land (1 m of topsoil is a minimum for re-establishing	Construction				X		

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
arable potential and about 150 mm is a minimum for wilderness land)							
The fill material must ideally be separated from the alluvium and norite and disposed of. However due to the low mobility, this is not considered to be a necessity	Construction				X	The site assessment confirmed that no topsoil stockpiles were present at Mortimer Smelter. As construction had been completed, compliance with mitigation measures was considered undetermined, since there were no applicable activities to evaluate during the audit.	
Land Capability Management							
As far as practically possible, topsoil must be stripped during any expansions	Construction				X	No expansions were underway at Mortimer Smelter during the site assessment. Compliance with the related mitigation measures was considered undetermined, as there were no relevant activities to assess during the audit.	
The required volume of excavated material necessary for geo-engineering must be kept to a minimum	Construction				X	No excavation or construction activities were observed at Mortimer Smelter during the site assessment. Compliance with mitigation measures for excavation and construction was considered undetermined, as no applicable activities were present for assessment.	
Biodiversity Management Plan							
Roads to and on the site must serve as suitable firebreaks for part of the area. Tall grass along the edges of the roads must either be mowed or burned shortly prior to the onset of the dry season. Where no	Construction/Operational/ Closure/Post Closure		X			Mortimer Smelter maintained an Emergency Preparedness and Response Procedure to manage emergencies effectively. Roads within and around the site functioned as firebreaks.	Document 13 Picture 20 - 23

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
roads are available to serve as firebreaks, special firebreaks must be established each season. These could either be strips approximately 6m wide which have been mowed (or grazed) and ploughed, or specially burned firebreaks						Grass within operational areas had been kept short and well maintained to reduce fire hazards and improve safety.	
Unnecessary disturbances of flora and fauna must be avoided or minimised.	Construction/Operational/ Closure		X			No disturbances to flora or fauna were recorded within or outside the operational boundary during the assessment. As the operational footprint did not include natural areas, this condition was not directly relevant to the site.	Picture 20 - 23
Limit, as far as practical, the area of land disturbed and isolated for the purpose of construction and processing activities, to the minimum required for safe and efficient operation.	Construction/Operational		X			Disturbances associated with infrastructure and operational activities were confined within the Smelter boundary. No unnecessary disturbances to flora or fauna were observed inside or outside the site limits.	Picture 20 - 23
No unnecessary destruction of vegetation must be allowed and, in particular, construction workers must not be allowed to harvest any trees for use as firewood or any other purpose.	Construction/Operational				X	As construction activities had concluded and no natural areas were present within the operational boundary, this condition was no longer applicable to the site.	
A monitoring programme must be implemented that must ensure that all weeds and alien species be eradicated in and around the project area. Monitoring must be done according to the Biodiversity Action Plan for the region.	Construction/Operational		X			No alien invasive species were identified during the audit. A close-out report from Agreenco confirmed successful eradication at the facility.	Document 21
Eradication and monitoring of alien plants must be done on an ongoing basis during the life of the Smelter	Construction/Operational		X			Evidence reviewed during the audit confirmed compliance with alien-plant eradication and monitoring requirements.	Document 21 - 22

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
and following rehabilitation, until self- sustaining vegetation cover, as close as practicably possible to the composition and density of the pre- development vegetation cover is achieved.						Supporting documentation included the Invasive and Alien Plant Species Survey and Management Plan by ENVASS and a close-out report from Agreenco, confirming effective management of alien vegetation.	
It may become necessary to relocate certain species, like Ostriches, to prevent interference with construction workers during construction.	Construction				X	As construction had been completed and the operational area contained no natural environments, contractor awareness programmes on indigenous fauna and flora preservation were not required. The condition was therefore not directly applicable to the site.	
Contractors are to be trained on environmental awareness and the importance of preserving indigenous fauna and flora.	Construction				X	Since construction activities at Mortimer Smelter had been completed, compliance with the associated mitigation measures was considered undetermined due to the absence of applicable activities during the audit.	
Conservation measures must be conducted during the construction phase.	Construction				X		
Natural flora species are not to be used as firewood	Construction				X		
Eradication and monitoring of alien plants must be done on an ongoing basis during the life of RPM-US and following rehabilitation, until self- sustaining vegetation cover, as close as practicably possible to the composition and density of the pre- mining vegetation cover is achieved.	Operational				X	Mortimer Smelter did not undertake concurrent rehabilitation as part of operations. As the site had been separated from Union (Siyanda Bakgatla) Mine, compliance with rehabilitation-related mitigation measures was considered undetermined, as they were not applicable.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
On completion of the construction phase, disturbed areas must be graded and topsoiled. The topsoiled areas must then be re-vegetated using indigenous pasture species. In general, re-vegetation must be undertaken using a mixture of commercially available seeds that will germinate reliably (high seed viability). The species used must be selected on the basis of their ability to bind and cover soil, (to afford effective erosion protection) and their tolerance of the prevailing environmental conditions	Operational				X		
A number of different methods of re-vegetation are available (e.g. hydroseeding, hand seeding and hand sowing) and an appropriate method must be selected by the Smelter or the contractor	Operational				X		
Following re-vegetation the site must be monitored and maintained until a sound vegetation cover that will prevent erosion, has been achieved	Operational				X		
The topsoil must be stripped and stored in a manner that ensures the seed bank is replaced during re-vegetation	Operational				X	Topsoil stripping and concurrent rehabilitation did not form part of Mortimer Smelter's operations. Because the Smelter had been separated from Union Mine (Siyanda Bakgatla), compliance with these measures was considered undetermined, as they did not apply to the site.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The objective must be undertaken following rehabilitation, until self-sustaining vegetation cover, as close to the composition and density of the pre-development vegetation cover as practical, is achieved in rehabilitated areas	Operational				X	Concurrent rehabilitation formed no part of Mortimer Smelter's activities. Since the Smelter had been separated from Union Mine (Siyanda Bakgatla), compliance with the mitigation measures was considered undetermined, as they were not applicable.	
A basic monitoring and control programme must be adopted. Specialist advice must be taken, especially for the use of herbicides	Operational		X			Mortimer Smelter complied with the condition relating to alien-plant eradication and monitoring. Evidence provided included the Invasive and Alien Plant Species Survey and Management Plan from ENVASS and a project close-out report from Agreenco, confirming effective management of alien vegetation.	Document 21 - 22
Air Quality Management							
Fugitive Emissions Management							
To reduce dust entrainment, water or an appropriate dust suppressant must be sprayed on topsoil stockpiles until such time as the topsoil stockpiles have been re-vegetated.	Construction/Operational/ Closure				X	Topsoil stockpiles were not present at Mortimer Smelter, as they formed part of Union Mine (Siyanda Bakgatla) from which the Smelter had been separated. Compliance with mitigation measures related to topsoil stockpiles was therefore considered undetermined since the requirement did not apply to the Smelter.	
There must be strict speed limits on dust roads to prevent dust entrainment into the atmosphere	Construction/Operational/ Closure		X			Speed-limit signage indicating a 10 km/h limit had been installed throughout the operational area of Mortimer Smelter. This measure served to reduce incidents and control dust emissions by promoting safe and controlled vehicle speeds.	Picture 24

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Should dust suppression measures by wetting not be effective, the Smelter must consider the use of dust suppression agents.	Construction/Operational/ Closure		X			Review of dust-monitoring reports and ambient-air quality assessments indicated that no exceedances of dust or PM ₁₀ levels had occurred around the Smelter. No dust-related complaints were recorded during the audit period, demonstrating effective dust-control practices at Mortimer Smelter.	Document 5, 23, 24
The installation of dust monitoring stations at strategic points (considering wind direction) must be undertaken should dust cause a nuisance to the surrounding communities	Construction/Operational/ Closure		X			Aquatco had been contracted to perform monthly dust-fallout monitoring and reporting at Mortimer Smelter. Multiple monitoring stations were strategically located across the operation to measure dust fallout. Results were evaluated against the GNR 827 limits and consistently indicated that dust fallout remained below the non-residential threshold throughout the year, with no exceedances recorded.	Document 23
Dust sampling must begin as soon as possible and continue on a monthly basis over a 12-month period in order to assess seasonal differences	Construction/Operational		X				
A network of dust monitoring points must be established to determine ambient dust concentrations initially, a network of dust buckets is proposed, since this provides a baseline of dust fallout concentrations	Operational		X				
A series of monitoring runs using high volume samplers is recommended to determine ambient TSP and PM ₁₀ concentrations. Depending on financial constraints a sampler can be installed and operated continuously for a 12-month period or a portable sampler could be used to monitor continuously for a one-month period. This procedure must be	Operational		X			Mortimer Smelter had obtained an Atmospheric Emission Licence (AEL) under reference BPD/MORTIMER/AEL/SEPTEMBER2020 on 27 August 2020. To maintain compliance with AEL conditions, the Smelter undertook regular monitoring with technical support from C&M Consulting Engineers for the operation and calibration of the ambient-air-quality monitoring network.	Document 3, 4, 5, 23

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
undertaken every three months over a 12-month period						Monthly reports were compiled using data from SO ₂ and PM ₁₀ stations at Mortimer, Bierspruit, 4B Decline and the Fridge Plant. An annual Atmospheric Emissions Survey was completed to evaluate CO, NO _x and SO ₂ emissions and confirm ongoing compliance.	
The results of the initial monitoring must determine whether any additional monitoring is necessary.	Operational		X			Mortimer Smelter had been issued an Atmospheric Emission Licence (AEL) under reference BPDM/MORTIMERAEL/SEPTEMBER2020 on 27 August 2020. Monitoring was carried out in accordance with licence conditions, and additional monitoring was implemented where stipulated by the AEL requirements.	Document 3, 4, 5, 23
Manage possible spillages of slag, overburden and ore from trucks transporting this material as per the Environmental Management System (EMS) (Non-conformance and corrective action procedure)	Operational		X			Mortimer Smelter had implemented a Slag Handling Procedure to minimise spillages. No spillages of slag, ore or overburden were observed during the site assessment. All conveyors were enclosed to prevent ore spillage and strengthen spill-prevention controls.	Document 25 Picture 25
Chemical dust suppressants or water sprayers must be used to control dust on the roads on a daily basis.	Operational		X			No evidence of chemical dust suppression or water spraying was identified during the assessment. All internal roads were surfaced and did not require dust suppressants. Ms Thato Moraope confirmed that Mortimer Smelter performed daily road sweeping for dust control, and a work order was reviewed as evidence of ongoing operations.	Picture 37 Document 51, 60

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						The dust-monitoring reports reviewed during the audit confirmed that Mortimer Smelter remained compliant with the GNR 827 National Dust Control Regulations for the annual period.	
Point Source Emissions Management							
More frequent analyses are to be performed on the expected particulate emissions in order to obtain a better representation of the expected metal composition in the emissions	Operational		X			Regular monitoring reports were compiled on a monthly and annual basis, covering measurements of various emissions, including particulate matter (PM), SO₃/H₂SO₄ mist and gaseous emissions (O₂, SO₂, NO_x, CO and CO₂) from the Mortimer Flash Dryer and Main stacks. Daily SO₂ readings were recorded and documented from the SCADA system as in-stack concentrations. These monitoring activities ensured comprehensive evaluation and documentation of emissions at Mortimer Smelter. Regular monitoring reports were compiled on a monthly and annual basis, covering measurements of various emissions, including particulate matter (PM), SO₃/H₂SO₄ mist and gaseous emissions (O₂, SO₂, NO_x, CO and CO₂) from the Mortimer Flash Dryer and Main stacks. Daily SO₂ readings were recorded and documented from the SCADA system as in-stack concentrations. These monitoring activities ensured comprehensive evaluation and documentation of emissions at Mortimer Smelter.	Document 3, 4, 5, 23, 26

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Mortimer Smelter is required to comply with all limits stipulated within the Atmospheric Emissions Licence. Should non-compliances be identified additional measures must be investigated	Operational		X			No unforeseen circumstances relating to the exceedance of SO ₂ emissions were identified during the assessment period. Daily SO ₂ readings were recorded and documented from the SCADA system for stack emissions and evaluated against the Atmospheric Emission Licence (AEL) limit of 52,000 mg/Nm ³ . Review of the monitoring results confirmed that no exceedances were recorded, indicating that SO ₂ emissions remained within the prescribed limits of the Atmospheric Emission Licence (AEL).	Document 3, 4, 5, 23, 26
An ambient air monitoring programme must be implemented in order to review the impact of SO ₂ and PM ₁₀ emissions from the site on a consistent basis	Operational		X			C&M Consulting Engineers had been appointed to supply, install, maintain and calibrate the ambient-air-quality monitoring network at Mortimer Smelter. As part of their responsibilities, they compiled monthly reports containing SO ₂ and PM ₁₀ monitoring data from Mortimer and provided an overview of pollutant sources, offering a comprehensive summary of air-quality monitoring results.	Document 5
Ground and Surface Water Management							
Procedures are in place to deal with blocked drains and general maintenance principles to avoid overflow	Construction/Operational/ Closure		X			In line with the ISO 14001:2015 Environmental Management System (EMS), Mortimer Smelter had implemented procedures such as the Inspections and Cleaning of Trenches Procedure and the Incident Investigation, Non-Conformity, Corrective and Preventative Action Procedure. These were established to ensure compliance with environmental	Document 10, 17

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						standards and to manage environmental aspects and incidents effectively.	
Recycling and re-use of water must be optimised and pollution of water must be minimised	Construction/Operational		X			Discussions with Ms Thato Moraope confirmed that process and wastewater at Mortimer Smelter were recycled into the Fraser Dam and reused in operations. Daily meter readings of potable and process water were recorded and compiled into a water-balance sheet to monitor losses, detect leakages and track system volumes. A copy of the water-balance sheet was reviewed as evidence of the closed-loop system's efficiency and the Smelter's commitment to sustainable water management.	Document 36, 50
Conduct regular surface and groundwater monitoring	Construction/Operational		X			Aquatico conducted monthly surface-water and quarterly groundwater monitoring at Mortimer Smelter in accordance with the Water Monitoring and Sampling Procedure. Comprehensive reports containing updated water-quality data were compiled and submitted to the Smelter. This systematic monitoring approach ensured regular assessment and adherence to water-quality standards at the site.	Document 19, 27, 28, 37
Should groundwater or surface water monitoring indicate that water quality or quantity has been affected by the Smelter, possible alternative water supply of equal or better quality must be provided to the affected communities. Furthermore, appropriate	Operational/Closure		X			Water-monitoring activities at Mortimer Smelter were conducted to evaluate potential impacts and track water-quality trends. Groundwater-monitoring results showed exceedances of groundwater-quality standards, prompting an investigation to determine the cause and identify appropriate remediation measures. A Groundwater Liability Assessment	Document 28. 29, 30

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
remedial measures should be taken should unacceptable levels of contamination be determined						was completed by Delta H Consultants in 2020 to assess potential groundwater liabilities and define required corrective actions. Based on water-quality reports and discussions with site personnel, no complaints or impacts necessitating alternative water sources for surrounding communities had been recorded. This indicated that the measures implemented to date were effective in maintaining water resources suitable for use without adversely affecting nearby communities.	
Dirty and clean water must be separated by implementing clean and dirty water systems / structures prior to construction to prevent pollution of clean water runoff. The clean and dirty water systems and structures must be properly designed (according to Regulation 704 of the National Water Act)	Construction	X				The footprint of Mortimer Smelter was classified as a dirty-water area, with trenches designed to collect and channel contaminated water to the Fraser Dam. However, not all areas identified for dirty-water collection had suitable systems or stormwater trenches in place, indicating that clean- and dirty-water separation had not been fully maintained.	Document 18, 20, 31 Picture 3 – 10
A proper system for the separation of dirty water and clean water must be maintained	Operational	X				The GN 704 audit report conducted in June 2022 identified deficiencies in the management of clean and dirty water systems, and no designs were provided to confirm compliance of water infrastructure with Regulation 704 of the National Water Act. During interviews with the site representative, it was confirmed that a Feasibility Study had been completed to determine requirements for redesigning the water management system,	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						but no progress had been made in implementing the required upgrades. This condition was considered significant and presented an operational risk, as the identified non-compliance could contribute to potential surface and groundwater contamination.	
Monitor surface and groundwater quality during the life of the Smelter as per the surface and groundwater monitoring procedure	Operational		X			At Mortimer Smelter, a surface- and groundwater-monitoring programme had been implemented in accordance with the Water Monitoring and Sampling Procedure to ensure compliance and accuracy. The monitoring results provided data on the quality and quantity of surface and groundwater resources, enabling Mortimer Smelter to track and assess potential impacts on water sources.	Document 19, 27, 28
Investigations to assess compliance with Regulation 704 of the National Water Act (No. 36 of 1998) must be undertaken	Operational		X			The auditor was been presented with a report prepared by ENVASS in 2022, addressing the technical component of the condition's requirements.	Document 31
Boreholes must be sited using geophysical assessments to identify zones of deeper weathering and preferential flow paths along faults and dolerite dyke contacts	Operational		X			Monitoring activities at Mortimer Smelter were conducted in accordance with the Water Monitoring and Sampling Procedure to maintain consistent and standardised practices. Groundwater monitoring was undertaken through a network of boreholes specified in Water Use Licence (WUL) 07/A24E/CGG/10781, issued on 20 August 2021.	Document 1, 19, 27, 28

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Boreholes must be sampled quarterly for the first two years and thereafter biannually using standard sampling practices	Operational		X			As per the requirements of the Water Use Licence (WUL), the boreholes at Mortimer Smelter are monitored quarterly. This monitoring frequency ensures regular assessment and evaluation of groundwater conditions in line with the licence obligations. By conducting these periodic assessments, Mortimer Smelter demonstrates its commitment to proper management and compliance with the WUL requirements.	Document 1, 19, 28
The Smelter must develop a spill contingency plan to ensure the clean-up of any spillages which have the potential to pollute water resources	Operational		X			Mortimer Smelter has developed and implemented a comprehensive Spill Handling Procedure. The procedure outlines step-by-step instructions and protocols to be followed in the event of a spillage, ensuring that necessary actions are taken promptly and effectively.	Document 9
It is important that the Smelter prevents, minimises or controls priority risks through planning, design, investment, management and workplace procedures.	Operational		X			Mortimer Smelter has implemented an ISO 14001:2015 Environmental Management System (EMS). By adhering to ISO 14001:2015 standards and implementing these management procedures, Mortimer Smelter demonstrates its commitment to identifying and mitigating environmental risks, ensuring sustainable operations, and promoting environmental stewardship through the documented procedures of the EMS.	Document 9, 10, 13, 14, 17, 19, 25, 42
A water management strategy must be developed. Key features of the strategy include: — Identification and recommendations regarding water management tools such as water / salt	Operational		X			A formal Water Management Plan had been established at Mortimer Smelter and was undergoing revision to address the condition's specific requirements. The plan provided a	Document 32

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
balances, programmes for exception monitoring and graphical outputs from monitoring databases — Identification of contamination indicators by use of interpretation ratios (e.g. SO₄:Cl ratios and how these change with location and time) — Setting of water quality targets in terms of concentrations, load, geographical area, time, legislative requirements, etc. — The Smelter must maximise on opportunities to recycle water — Exposed surfaces within dirty areas must be kept to a minimum to minimise the volume of dirty runoff generated						comprehensive framework for managing site water resources as per the requirements of the condition. Available information indicated that Mortimer Smelter actively implemented a water management strategy supported by documentation and reporting processes. The ongoing revision of the plan reflected the Smelter's commitment to continuous improvement of its management systems.	
The pipelines containing potentially polluting material must be designed to minimise the risk to soils and watercourses along the pipeline route.	Operational		X			To enable early detection and containment of leaks or spills, pipelines at Mortimer Smelter had been installed aboveground or within concreted trenches where feasible. Spillages from these pipelines were contained within the dirty-water systems and were not released into the environment.	Document 9, 10, 33
Management measures must be devised for the detection of leakage / spills from pipes and dirty water systems and response plans.	Operational		X			During an interview with Ms. Thato Moraope, it was confirmed that monthly inspections of surface infrastructure are conducted through site walkabouts to identify any maintenance requirements or issues. These maintenance needs are then recorded as incidents in the ENABLON	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						System, where Maintenance Working Orders are generated and appropriate rectification measures are implemented.	
Fulfil permit requirements as recommended in SRK Report 222565.	Operational	X				The assessment of the management measures recommended in the SRK 222565 report is as follows: 1. Minimizing Infiltration of Surface Water through Stormwater Drains: It was observed that damaged and blocked drains, may allow surface water infiltration through the stormwater system. 2. Quarterly Groundwater Monitoring and Data Collection: Boreholes are currently being monitored on a quarterly basis as required. Due to the fact that the stormwater and drainage infrastructure was observed to be blocked resulted in a non-compliance to the condition as infiltration of the contaminated water may result in groundwater contamination.	Document 28, 33 Picture 3 – 10
The pollution potential must be assessed to determine the significance of the impact.	Closure				X	Based on the current assessment and the operational phase of Mortimer Smelter, the condition does not necessitate any immediate actions. However, it is important to continue monitoring and reviewing the condition throughout ongoing operations to ensure sustained compliance and to address any potential future concerns that may arise as the site progresses toward eventual closure.	
Surface Water Management Plan							

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
If surface water is contaminated by an oil spillage, the surface water must be neutralised as soon as possible.	Construction/Operational/ Closure	X				During the audit, a number of oil spills were identified by the auditor that were not managed or neutralised as soon as possible. Coupled with the issue of blocked storage drains it is highly probable that the water contained in the closed loop system will be contaminated and released into the environment.	Picture 35, 36
All surface water management infrastructure (bends, canals and bunds) must be inspected on a monthly basis, more frequently during periods of high rainfall and after each major rain event.	Construction/Operational		X			It should be noted that although the surface infrastructure is blocked, the Environmental Officer conducts monthly inspections of the surface infrastructure at Mortimer Smelter to assess its condition, identify any issues or maintenance needs, and ensure compliance with environmental standards. During these inspections, the Environmental Officer documents evidence of the inspections, records any actions taken, and tracks the status of corrections or remedial measures.	Document 33
No activities and infrastructure are allowed within 1:50 floodline or 100 metres from the edge of the river, whatever is the greater, without the necessary authorisation from DWA	Construction				X	Construction activities at the site have been completed, and as such, the condition is currently considered "undetermined" in this operational phase. Since no construction activities are ongoing, the specific requirements and compliance status related to this condition cannot be assessed at this time. It will be important to reassess the condition during relevant phases or if new construction activities are planned or initiated in the future.	
Ensure the establishment of stormwater diversion berms around the contractor lay down area and other potential contaminated areas (e.g. diesel storage tanks or refuelling stations).	Construction				X		

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Clean stormwater must be diverted around the construction site to the nearest water course.	Construction				X		
Dirty water (contaminated runoff) must be contained within the Smelter boundary to be reused, treated or evaporated	Construction				X		
Dirty water must be collected in sumps and pumped to a storage facility for use in dust suppression.	Operational	X				At Mortimer Smelter, a closed-loop water management system is in place, where dirty water generated from various operations is directed through pipes and trenches to the Fraser Dam. This water is recirculated within the operational areas of Siyanda Bakgatla Platinum Mine, Concentrator, and the Smelter for operational uses. It should however be noted that blockages and leakages observed during the audit have resulted in a non-conformance as this water was released into uncontrolled areas.	Document 36, 50 Picture 3, 4, 5, 6, 7, 8, 9, 10
Post closure runoff must be contained in the return water dams and evaporated.	Closure				X	As the facility is in the operational phase, the condition does not require any immediate actions to be taken. As a result, the condition is currently considered undetermined, and there are no specific measures or requirements that need to be addressed at this time.	
Stormwater run-off control measures must be instituted to prevent the loss of topsoil.	Closure				X		
Groundwater Management Plan							
Install boreholes and monitor these and existing boreholes for water quality	Construction/Operational/ Closure/Post Closure		X			Mortimer Smelter implements a Water Monitoring and Sampling Procedure to ensure effective management of water resources. As part of this procedure, Aquatico has been	Document 27, 28

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						appointed to conduct quarterly groundwater monitoring at the boreholes installed in line with the requirements of the approved Water Use Licence.	
Monitoring of water levels in surrounding boreholes must form part of the existing groundwater monitoring programme	Construction/Operational/ Closure/Post Closure		X			At the time of the audit, it was noted that water levels were monitored in the existing boreholes as per the Water Use Licence authorised for the facility.	Document 28
Positions for additional boreholes need to be identified that would measure all current and potential future groundwater quality and groundwater level impacts	Construction/Operational/ Closure/Post Closure		X			Monitoring activities at Mortimer Smelter are carried out in strict accordance with the Water Monitoring and Sampling Procedure. This includes comprehensive groundwater monitoring conducted through a network of boreholes, as specified in the Water Use Licence.	Document 1, 19, 28
The monitoring boreholes must be protected to prevent the ingress of surface water into the boreholes	Construction/Operational/ Closure/Post Closure		X			During the assessment, the monitoring boreholes at Mortimer Smelter were observed to be properly cased and capped, as depicted in the images of the groundwater quality monitoring report.	Document 28
The samples must be analysed for major anions and cations by a recognised laboratory. The analyses must be incorporated into a database to permit timeous action in the event of unacceptable contamination levels occurring	Construction/Operational/ Closure/Post Closure		X			Water samples collected at Mortimer Smelter are analysed for major cations and anions as required by the Water Use Licence by Aquatico Scientific, a SANAS Accredited Laboratory. The water quality results obtained from the laboratory analysis are then recorded and captured into a monitoring database, as required by the monitoring protocols and procedures in place. This database serves as a central repository of water	Document 27, 28, 55

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						quality data, enabling efficient tracking and management of water quality trends over time.	
Groundwater monitoring must be undertaken to demonstrate that there is little or no impact on the regional aquifer	Construction/Operational/ Closure/Post Closure		X			Groundwater is monitored on a quarterly basis by Aquatico to determine the impact on the regional aquifer.	Document 28
An alternative water supply must be made available to affected groundwater users should unacceptable levels of contamination occur	Construction/Operational/ Closure/Post Closure		X			Water monitoring at Mortimer Smelter is carried out to assess potential impacts and track water quality trends. However, during the monitoring process, it was identified that the groundwater quality standards were exceeded. In response, an investigation was conducted to identify the cause of the exceedances and explore potential remediation measures. Furthermore, a Groundwater Liability Assessment, conducted by Delta H consultants in 2020, revealed that within the 100-year simulation period, no existing groundwater users were affected by the identified groundwater quality issues.	Document 28, 29, 30
Conduct an up-to-date detailed hydrocensus and user survey	Construction/Operational		X			In August 2020, a comprehensive Groundwater Liability Assessment was completed for Mortimer Smelter and the Siyanda Bakgatla Platinum Mine. This assessment included an updated hydrocensus, which involved a detailed examination of the groundwater resources in the area.	Document 30
Impacts to groundwater during the construction phase are expected to be minimal and must be further reduced by following an Environmental Management System	Construction				X	Construction activities at Mortimer Smelter have been completed, and as a result, the status of the condition is deemed "undetermined."	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Noise Management Plan							
Adhere to legislated noise levels for Smelters	Operational		X			Occupational noise monitoring at Mortimer Smelter is conducted by the internal Occupational Health Department to ensure the health and safety of employees. Additionally, an annual Environmental Noise Assessment was carried out by SOHS in May 2025 and finalised in June 2025 to assess the noise levels in the surrounding environment. Based on the monitoring results, it was determined that both daytime and night-time noise levels were compliant with the stipulated World Bank Guideline limit of 70 dBA. This indicates that the noise emissions from Mortimer Smelter are within acceptable levels and do not pose a significant risk to the surrounding environment or the well-being of individuals in the vicinity.	Document 38
Where it is impossible to mitigate ambient noise levels to below a change of 7dB, affected communities must be consulted to determine mitigation measures	Operational				X	Mortimer Smelter operates in an area where there are no directly affected local communities in close proximity to the facility. This implies that the immediate surrounding area does not have residential or community settlements that could be directly impacted by the smelter's operations.	
Ambient noise levels must be monitored. These monitoring activities must help to establish actual noise levels (as opposed to modelled noise levels) to reassess impacts and management measures	Operational		X			An annual Environmental Noise Assessment was carried out by SOHS in May 2025 and finalised in June 2025 to assess the noise levels in the surrounding environment. Based on the monitoring results, it was determined that both daytime and night-time noise levels were compliant with the	Document 38

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						stipulated World Bank Guideline limit of 70 dBA. This indicates that the noise emissions from Mortimer Smelter are within acceptable levels and do not pose a significant risk to the surrounding environment or the well-being of individuals in the vicinity.	
Visual Management Plan							
Use low wattage light bulbs where possible to reduce potential for light pollution	Operational		X			Based on interviews conducted with site personnel during the audit and on observations made at the time, it was confirmed that Mortimer Smelter takes measures to minimize light pollution. Low wattage bulbs are utilized whenever possible to reduce the potential for excessive lighting and its associated impacts. Additionally, no records of complaints or issues related to light pollution were identified during the audit period.	Document 24, 35
Place focused lighting at low levels and direct on specific objects, areas, or activities to reduce potential for light pollution	Operational		X			Based on interviews conducted with site personnel and observations made during the audit, it was confirmed that Mortimer Smelter implements focused lighting practices, directing lighting towards specific areas, activities, and objects. During the audit, no concerns or issues related to lighting were identified.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Use exterior paints and non-reflective finishes to minimise glare and reflection from built surfaces	Operational		X			During the audit, it was observed that Mortimer Smelter had taken steps to minimize glare and reflections by painting buildings and structures with appropriate exterior paint.	Picture 26 - 28
Social Management Plan							
Local entrepreneurs and previously disadvantaged contractors must be provided preferential opportunities to tender for contracts	Construction/Operational/ Closure/Post Closure		X			Within Mortimer Smelter, the Procurement Department plays a crucial role in ensuring fair and inclusive procurement practices. The department actively seeks to provide preferential opportunities to previously disadvantaged contractors and local sources, aiming to promote economic empowerment and support the growth of local businesses. During the audit, evidence of procurement methods, documented procedures, and procurement records were reviewed, confirming the commitment to transparent and accountable procurement processes.	Document 39, 40, 41, 42, 54
Recruitment must favour local employment and skills training. RPM-US must establish skills training programmes for locals to address RPM-US's needs and to promote small, medium and micro enterprise (SMME) development.	Construction/Operational/ Closure/Post Closure		X			Mortimer Smelter recognizes the importance of promoting local community development and fostering economic empowerment through its recruitment and selection processes. The implementation of the Recruitment and Selection Procedure prioritizes the recruitment and development of individuals from the surrounding communities, providing them with opportunities for employment and growth within the smelter operations.	Document 39, 40, 41, 42, 54

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						To support the professional development of its employees, Mortimer Smelter has established a Training, Awareness, and Competence Procedure. This procedure assesses the training needs of employees and ensures that they acquire the necessary skills and competencies to effectively perform their roles within the smelter operations.	
No loitering must be allowed in the vicinity of the Smelter outside working hours	Construction/Operational/ Closure/Post Closure		X			During the site assessment, it was observed that loitering is not present at the Mortimer Smelter operations. Adequate security measures are in place to prevent unauthorized individuals from lingering on the premises. Security personnel are stationed at the smelter to monitor and ensure the safety and security of the facility. In the event that any loiterers are detected, appropriate actions are taken to remove them from the premises and maintain a controlled and secure environment.	
A complaints register must be developed and should any complaints be received, these must be logged in the complaints register and reported to the responsible person on site	Construction/Operational/ Closure/Post Closure		X			At Mortimer Smelter, a complaints register is established to ensure effective management and resolution of any concerns or grievances raised by stakeholders. The register serves as a centralized system to record, investigate, and address complaints in a timely and systematic manner.	Document 24
Complaints must be treated seriously and Smelter must respond to all complaints. Furthermore, corrective actions should be implemented	Construction/Operational/ Closure/Post Closure		X			During the audit period, no complaints were recorded in the complaints register. Complaints are treated seriously and are recorded and actioned as incidents.	Document 24

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Where possible, skilled and unskilled labour must be sourced locally	Construction/Operational		X			Mortimer Smelter places a strong emphasis on community involvement and empowerment through its Recruitment and Selection Procedure. The smelter actively prioritizes the recruitment and development of individuals from the local communities when these positions arise.	Document 40, 42
Principles of equality, BEE, gender equality and non-discrimination must be implemented	Construction/Operational		X			Mortimer Smelter is dedicated to promoting equality and fostering a workplace environment that is free from discrimination. The Employment Equity Policy at Mortimer Smelter aims to create a diverse and inclusive workforce by ensuring equal opportunities for all employees with preference for BEE employees. The policy emphasizes the fair treatment of individuals and prohibits any form of discrimination based on factors such as race, gender, age, disability, or any other protected characteristic.	Document 40, 42
No recruitment at the construction site is allowed	Construction/Operational		X			Construction activities have been completed at Mortimer Smelter. The focus has now shifted to the operational phase of the smelter. Recruitment activities are managed by the Human Resources (HR) Department in adherence to the established Recruitment and Selection Procedure. This procedure outlines the guidelines and criteria for the recruitment and selection of employees to fill various positions within the organization. The HR Department plays a vital role in ensuring that the	Document 40, 42

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						recruitment process is fair, transparent, and aligned with legal and regulatory requirements. They evaluate candidates based on their qualifications, skills, and suitability for the available positions.	
Material Data Sheets must be updated regularly and be available on site	Construction/Operational/ Closure		X			At the time of the audit, Material Safety Data Sheets were observed throughout the facility as well as back-up copies kept on file in the Environmental representative's office. MSDS sheets were observed to be updated regularly.	Document 61
The Smelter must actively participate in regional, district and local development forums and establish appropriate communication mechanisms with local political and institutional structures.	Construction/Operational/ Closure		X			During the audit, Mortimer Smelter provided evidence in the form of meeting attendance registers and meeting minutes, demonstrating their active participation in various communication structures. These structures included regional, district, and local development forums.	Document 52, 53
The Smelter, its contractors, authorities and neighbouring communities must liaise regularly	Construction/Operational/ Closure		X			Evidence of Mortimer's participation in regular liaison with contractors, authorities and neighbouring communities were available at the time of the audit.	Document 52, 53, 54
Extend and improve HIV/AIDS awareness programme for workers and contractors	Construction/Operational/ Closure		X			Mortimer Smelter has demonstrated its commitment to improving HIV/AIDS awareness among its workers and contractors through the implementation of a documented program. This program aims to educate and raise awareness about HIV/AIDS, ensuring that employees and contractors have access to information, resources, and support related to HIV/AIDS prevention, treatment, and care.	Document 56

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The Smelter must formulate joint safety and security measures with local stakeholders, support community policing forums and assist in policing surrounding public spaces	Construction/Operational/ Closure		X			Mortimer Smelter has established a relationship and memorandum of understanding with the South African Police Service (SAPS) and the Mortimer Smelter appointed Protection Services to foster collaboration and enhance security measures within and around its operations.	Document 43
The Smelter must implement management commitments with respect to noise, dust, safety, blasting and vibrations and other, activities having a significant impact on community health	Construction/Operational/ Closure		X			At Mortimer Smelter, comprehensive environmental monitoring programs in line with its' ISO 14001 EMS are in place to assess and manage potential impacts related to noise, dust, surface water, and groundwater.	Document 4, 5, 23, 27, 28
To prevent inadvertent access, community access to construction and operation areas, must be strictly controlled using fencing / warning tape and warning signs and access control	Construction/Operational/ Closure		X			Access to the Mortimer Smelter operation is strictly controlled through a fenced perimeter, with a single main access gate serving as the entry point. Prior to entering the site, all visitors are required to undergo access control procedures and induction, which are facilitated by a designated Mortimer Smelter representative.	Picture 29
Smelter employees and contractors must be briefed about appropriate road safety measures. In addition, traffic control measures must be enforced	Construction/Operational/ Closure		X			All contractors working at Mortimer Smelter are required to undergo a mandatory induction process, through Passport 360, during which they receive comprehensive information on road safety measures, rules, and control measures.	Document 54 Picture 20, 21, 24, 29
Penalties and disciplinary actions must be imposed on employees and contractors for non-compliance with safety, environmental and social measures	Construction/Operational/ Closure		X			Based on interviews conducted on site, Mortimer Smelter takes prompt action when instances of non-compliance with safety, environmental, and social measures by employees and contractors are reported. Hearings are convened to address	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						such non-compliance cases, ensuring that the necessary investigations are conducted.	
Suitable accommodation and security must be provided for employees during construction	Construction				X	As construction activities have been completed at Mortimer Smelter, this specific condition is no longer applicable and subject to audit. Therefore, an undetermined finding is recorded regarding the compliance status of this condition.	
Construction sites must be fenced and access controlled (for people and cattle)	Construction				X		
Spillages and Incident Management Plan							
An emergency management system must be implemented, including procedures and training for dealing with incidents as per the Environmental Management system.	Construction/Operational/ Closure		X			Mortimer Smelter has implemented a comprehensive Spill Handling Procedure, which includes measures to address leaks and spills from pipes, as well as an Emergency Preparedness and Response Plan to be activated in the event of incidents classified as emergencies. During the audit it was noted that throughout the operation, spill kits have been strategically placed to facilitate prompt and effective response to spills. These kits are readily available and equipped with the necessary tools and materials to contain and mitigate spills, ensuring a swift and appropriate response. In the event of a spill, it is treated as an incident and recorded following the Incident Investigation, Non-Conformity, Corrective and Preventative Action Procedure. This procedure outlines the necessary steps to be taken to investigate the	Document 9, 10, 13, 14, 15 Picture 1, 2
In the event of an incident the Emergency Preparedness and Response Plan must be followed	Construction/Operational/ Closure		X				
Any incidents must be reported as soon as possible. Measures must be put in place to prevent similar incidences from occurring. If necessary, remediation of any contamination must be carried out	Construction/Operational/ Closure		X				
Management measures must be put in place for the detection and repair of leakage / spills from pipes and dirty water facilities	Construction/Operational/ Closure		X				
If a spillage of a hazardous material occurs the resultant hazardous waste must be cleaned up using	Construction/Operational/ Closure		X				

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
absorbent material provided in spill kits on site and disposed of in a designated hazardous waste bin						incident, identify the root causes, implement corrective actions, and prevent similar incidents from occurring in the future.	
Spilled hydrocarbons must be disposed of at a designated area.	Construction/Operational/ Closure		X			Hazardous waste resulting from spills are collected and temporarily stored at the Hazardous Waste Sorting area. For the management and disposal of this waste, Mortimer Smelter has appointed a contractor, who specializes in waste management, to handle the collection and disposal of the hazardous materials in accordance with relevant regulations and standards.	
Spilled material must be cleaned up and disposed of appropriately as soon as practically possible	Construction/Operational/ Closure		X			During the audit, records documenting the destruction of spilled clean-up materials were made available, indicating proper disposal and management of the waste generated during spill response activities.	
Access to storage areas on site must be restricted to authorised employees only	Construction/Operational/ Closure		X			Access to the waste-storage area was strictly limited to authorised personnel and controlled through secure measures. The area remained locked, ensuring that only designated individuals with the required authorisation could enter. To enhance security and awareness, a notice board was prominently displayed near the waste-storage area, providing information and instructions on access procedures and emphasising the need to make arrangements prior to entry.	Picture 30

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Appropriate remedial measures as detailed in the non-conformance and corrective actions procedures and spillage-handling and clean up procedure must be implemented to deal with incidents of spillages. These procedures are included in this EMPR	Construction/Operational/ Closure		X			The procedures and guidelines for remediating spillages were detailed in the Spill Handling Procedure and the Environmental Management Programme (EMPr). These documents provided clear instructions on the steps to be followed in the event of a spillage to ensure effective and safe response. The EMPr also incorporated spill-response and remediation measures within its environmental management framework, outlining specific requirements and responsibilities for spill management to ensure that appropriate precautions and actions were taken to protect the environment and prevent adverse impacts.	Document 9, 12
Waste Management Plan							
All hazardous waste must be disposed of at a registered hazardous waste disposal facility (Holfontein) or stored in designated, lined and bunded areas (for no longer than 90 days).	Construction/Operational/ Closure		X			All hazardous waste generated at Mortimer Smelter is stored within the designated Hazardous Sorting Area, which is designed with impermeable surfaces and bunded areas to prevent any potential leaks or spills from contaminating the surrounding environment. To ensure proper and responsible disposal, Mortimer Smelter has engaged the services of a registered domestic and hazardous waste removal company. The contractor is responsible for regular collection and removal of the hazardous waste from the site and for disposal thereof at licensed facilities. Hazardous waste is not stored on-site for longer than 90 days.	Document 6, 7, 8, 44 Picture 16, 30

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Records of all waste being taken off site must be recorded and kept as evidence.	Construction/Operational/ Closure		X			At the time of the audit, comprehensive documentation of waste removal volumes and records of disposal was made available to the auditor for review.	Document 6, 7, 8, 44
General waste must be disposed of by an approved waste disposal facility which must be made available for all employees to use.	Construction/Operational/ Closure		X			Waste is separated at source through colour coded bins located throughout the facility, and waste is further separated at the waste storage area to ensure that recyclables are removed from the waste streams to be disposed of as general waste.	Document 6, 7, 8, 44 Picture 31, 32, 33
Waste oil and any other hazardous wastes must be disposed of by suitably qualified contractors (WMP).	Construction/Operational		X			Mortimer Smelter has a secure Hazardous Sorting Area with impermeable surfaces and containment to manage hazardous waste. They partner with a registered waste service provider for regular collection and transportation of hazardous waste, including waste oil, to a disposal facility. In line with the Zero Waste to Landfill Policy.	Document 6, 7, 8, 44 Picture 30, 31, 32, 33
All waste must be sorted and stored in clearly marked containers.	Operational/Closure		X			Colour coded bins and waste skips were present throughout the site for use by employees and contractors. A registered domestic and hazardous waste removal company is contracted to sort, remove and dispose of the general waste.	Document 6, 7, 8, 44 Picture 30, 31, 32, 33
A formal waste collection system is in operation at the Smelter, disposal must take place at a licenced waste disposal site according to Smelters waste management protocol.	Operational		X			Mortimer Smelter has a Waste Management Procedure (MSM-ALL-ENV-PRO-0001) to guide employees and contractors in handling, transporting, and disposing of various waste types. They partner with a waste management service	Document 6, 7, 8, 44

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Waste (other than mine residue) must be stored, handled, transported and disposed of in accordance with a documented waste management protocol.	Operational		X			provider for sorting, removal, and disposal of domestic, medical, and hazardous waste at a licensed facility. The Zero Waste to Landfill Policy promotes recycling, reuse, and responsible disposal to minimize landfill impact.	Picture 30, 31, 32, 33
Health and Safety Management							
Access to the site must be controlled	Construction/Operational/ Closure		X			Access to the Mortimer Smelter operation is strictly controlled through a fenced perimeter, with a single main access gate serving as the entry point. Prior to entering the site, all visitors are required to undergo access control procedures, which are facilitated by a designated Mortimer Smelter representative. The access control measures are in place to ensure the safety and security of the site and its personnel. By strictly regulating access, the smelter can effectively manage and monitor the movement of individuals entering and exiting the premises. This helps to prevent unauthorized access, maintain a secure working environment, and safeguard sensitive areas within the operation.	Picture 21, 23, 29
Ensure the appointment of a Safety Officer to continuously monitor the safety conditions during construction and closure	Construction/Operational/ Closure		X			Mr. Ofentse Dire has assumed the role of Safety Officer (as per section 2.17.1 of the Mine Health and Safety Act, 1996) at Mortimer Smelter. In this capacity, Mr. Dire is responsible for overseeing and enforcing safety principles within the facility.	Document 45
Facilitate regular medical examinations for Smelter employees through local health care services	Construction/Operational/ Closure		X			During the audit, records of the annual medical check-ups at the local hospital were made available for review by the auditor. These records serve as evidence of the compliance	Document 58

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						with the requirement for employees to undergo regular medical examinations.	
The Smelter must ensure that contractors and their staff are trained regarding the SHE procedures to be followed on site. Penalty clauses for transgressions must also be considered in this regard	Construction/Operational/ Closure		X			All contractors working at Mortimer Smelter were required to complete a mandatory induction process via Passport 360, during which they received detailed information on road-safety measures, site rules and control procedures. This induction ensured that contractors were aware of and understood the safety protocols applicable to the site. To maintain compliance with health, safety and environmental (SHE) requirements, contractors were also required to keep safety files containing documentation such as safety procedures, risk assessments, training certificates and other relevant records.	Document 54
Ensure passenger safety; required road signs and marked passenger crossing, bus and taxi stops.	Construction/Operational/ Closure		X			Ms. Claudette Kruger confirmed that strict safety measures are in place at Mortimer Smelter to ensure the well-being of all individuals within the operational area. Additionally various traffic control measures have been implemented throughout the site to promote safe and orderly movement. These measures include the installation of stop signs, speed limits, zebra crossings, boom gates, and traffic lights at appropriate locations.	Picture 20, 21, 23, 24
In-service training, where applicable, must be provided to contractors and labourers.	Construction/Operational		X			At Mortimer Smelter, a comprehensive Training, Awareness, and Competence Procedure is in place to ensure that employees receive appropriate training and development opportunities. This procedure is designed to assess the in-	Document 16

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						service training needs of employees and address any skill gaps or competency requirements. Through the Training, Awareness, and Competence Procedure, Mortimer Smelter aims to enhance the knowledge, skills, and capabilities of its workforce. This includes providing relevant training programs, workshops, and educational resources to support the professional growth and development of employees.	
Contractors and labourers must be trained in Health and Safety Policies, Environmental Awareness, Emergency Preparedness.	Construction/Operational		X			Mortimer Smelter has implemented various measures to raise awareness and provide training on safety, health, and environmental (SHE) policies. All contractors and employees undergo a comprehensive induction process that includes familiarisation with the company's SHE Policy. This induction ensures that everyone is aware of the importance of adhering to safety and environmental standards while working at the facility. Monthly talk topics are designed to educate employees at all levels of the organization on environmental best practices and related issues. In addition to training, Mortimer Smelter has an established Emergency Preparedness and Response Plan that is communicated with employees and contractors and is tested regularly to ensure that they are well-prepared to respond effectively in the case of an emergency. Emergency contact details are prominently displayed on notice boards throughout the facility.	Document 13, 14, 15, 16

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The Smelter must be actively involved in the prevention of social ills associated with contractors	Construction				X	As the construction phase at Mortimer Smelter has reached its completion, it is determined that this specific condition is no longer applicable and auditable. Therefore, an undetermined finding has been recorded in relation to this condition. It is important to acknowledge the conclusion of construction activities and recognize that further assessment in this context is not warranted.	
Contractors and their families may not stay on site	Construction				X		
Table 8-2: Environmental Management Processing Operations Commitments							
Soil and Land Management Plan							
Soil Management							
Volumes of stockpiled materials must be accurately recorded. Records must be made available on request	Construction				X	Construction activities at Mortimer Smelter have been completed, and as a result, there are no stockpiled construction materials, soil, or overburden at the site.	
Systems to separate clean and dirty water must be installed and maintained for all new infrastructure	Operational		X			All facilities had been designed to effectively separate clean and dirty water through the inclusion of impervious flooring and bunded areas where required.	Picture 34
Land Capability Management							
The norite and alluvial material can be used on site as backfill or for landscaping purposes.	Construction/Operational/ Closure				X	Excavation and mining activities are not part of Mortimer Smelter’s process, and as such, the presence of norite and alluvial material is not relevant to the operation. Therefore, this condition cannot be assessed as it does not apply to the site.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Biodiversity Management Plan							
The Smelter must limit, as far as practical, the area of land disturbed and isolated for the purpose of construction and processing activities, to the minimum required for safe and efficient operation	Construction/Operational		X			Limited land disturbance was observed within the operational boundary of the Smelter, specifically related to infrastructure and operational practices. No additional disturbances beyond the operational boundary were identified during the assessment.	
Air Quality Management Plan							
Fugitive Emissions Management							
In order to accurately quantify the risks associated with the disposal of the milled slag onto a TSF, the following are required:: - Take multiple samples of slag and residues from each facility. - Analyse a number of replicates for each sample to avoid calculations involving outliers. - Use spiked samples to confirm critical values close to the detection limit, especially for Hazard Rating 1 constituents. - Compare the findings in terms of Minimum Requirements with those in terms of US Environmental Protection Agency and possibly	Operational		X			Delta H conducted a comprehensive geochemical characterization in April 2019, including the evaluation of potential Acid Rock Drainage (ARD) and Metal Leaching (ML) from the Mine Residue Deposits (MRDs) at the Smelter. Samples were analyzed from sources such as the Airfield/New Ivan TSF, fresh slurry material, Mortimer TSF material, Fraser Alexander Dam sediments, slag dump, slag material from the silo, and spud rock. The waste classification and studies align with NEM Norms and Standards, as specified in Government Notices R. 634, 635, and 636 (Government Gazette No. 36784, 23/08/2013), adhering to Best Practices. Additionally, Mortimer Smelter has an existing historical (2015) Risk Assessment and Rehabilitation Plan, which includes waste	Document 47, 48

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
European Union protocols to get a more balanced assessment of the Hazard. - Base acid generation potential on sulphide as opposed to total sulphate, particularly on weathered or chemically oxidized materials. - Sensitivity analyses on a range of slag footprint areas onto which the slag is likely to be disposed. Perform high level risk assessments to indicate the likely risks to realistic receptors.						classification, ABA (available acid-base account) analysis, and waste risk profiles.	
Point Source Emissions Management							
Mortimer Smelter is required to comply with all limits stipulated within the Atmospheric Emissions Licence. Should non-compliances be identified additional measures must be investigated.	Operational		X			Mortimer Smelter has been granted an AEL (BPDM/MORTIMDERAEL/SEPTEMBER2020), under Section 46(1) and 47(1) of NEM:AQA. At the time of the audit, stack monitoring reports were provided to the auditor, confirming conformance to the limits provided in the AEL.	Document 3, 5
Mortimer Smelter is required to comply with the monitoring requirements stipulated within the Atmospheric Emissions Licence	Operational		X			Mortimer Smelter conducts regular monitoring activities in line with the stipulated requirements of the AEL to ensure compliance with emission limits.	Document 5
The regular maintenance and servicing of the electrostatic precipitators is done on a weekly basis. External contractors are used on a quarterly basis for major maintenance. These mitigatory measures are	Operational		X			Maintenance activities at Mortimer Smelter are conducted as necessary, with internal maintenance performed weekly and major maintenance outsourced to external contractors. The smelter operates in compliance with the AEL issued on	Document 3, 33

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
currently operating effectively to minimise emissions from the smelter.						27 August 2020 (BPD/MORTIMDERAEL/SEPTEMBER2020), and all monitoring and maintenance activities adhere to the specified requirements.	
If continuous measurements on the stacks are not performed, source emission measurements must be completed on a scheduled basis to obtain a more representative record of emissions.	Operational		X			Mortimer Smelter contracted C&M Consulting Engineers to supply, install, maintain, and calibrate an ambient air quality monitoring network. Monthly and annual reports, including measurements of particulate matter (PM), SO ₃ /H ₂ SO ₄ mist, and gaseous emissions (O ₂ , SO ₂ , NO _x , CO, and CO ₂), are compiled, with daily SO ₂ readings recorded and documented from SCADA in terms of in-stack concentrations.	Document 3, 26, 33
Ground and Surface Water Management							
Seepage must be collected in perimeter drains, which flow to the return water dams for reuse.	Operational	X				The auditor noted that perimeter drains intended to manage seepage have not yet been installed at the Slag Dump area. In response, Mortimer Smelter initiated a project in 2021 to design and construct toe drains for this area. Further investigations are underway regarding the potential lining of the Frazer Dam. These corrective initiatives remain pending implementation, and the absence of such infrastructure currently presents a potential risk of groundwater contamination.	Document 18 Picture 25

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Hydrogeological assessments must be undertaken along the southern and eastern boundary of RPM-US operational area to assess the extent of the contaminant plume. Transport modelling may be required to assess the long-term impact of groundwater pollution on closure.	Operation/Closure/Post Closure		X			In August 2018, a comprehensive Groundwater Liability Assessment was conducted for Mortimer Smelter and the Siyanda Bakgatla Platinum Mine. This assessment included an updated hydrocensus to better understand groundwater conditions.	Document 30
Rehabilitation of the slagheap must be done, to ensure that it blends with the surrounding environment. Thereafter topsoil must be deposited. Compost might be added if necessary, to facilitate re-vegetation.	Operational				X	The current state of the Slagheap does not support rehabilitation, making it difficult to fully assess the condition. However, a Final Rehabilitation Plan prepared by SRK in 2024 outlines the proposed future rehabilitation process for the Slag Dump.	Document 11
Groundwater Management Plan							
Transport modelling may be required to assess the long term impact of groundwater pollution on closure.	Construction/Operational/Closure/Post Closure		X			A pollution plume model update was carried out in 2021, with further updates planned for the closure phase. The updated model will guide the rehabilitation efforts during the closure phase.	Document 59
The infrastructure must be dismantled and removed on closure.	Closure			X		The current operational state does not facilitate rehabilitation, and as a result, the condition cannot be fully assessed at this time. However, a Final Rehabilitation Plan, prepared by SRK in 2024, outlines the proposed process for the future rehabilitation of the operations.	Document 11
Visual Management Plan							

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The plant infrastructure must be dismantled at closure and the plant area rehabilitated in line with the following commitment contained in Smelters existing EMPR: - Infrastructure that cannot be used following closure must be demolished and the demolished structure removed from the area. The ground must then be ripped, levelled and the area rehabilitated.	Closure			X		Noted. An annual Final Rehabilitation, Decommissioning, and Closure Plan (SRK Consulting, 2024) has been completed, demonstrating compliance with the condition pertaining to the closure phase.	Document 11
Table 8-3: Environmental Management Central Services Commitments							
Soil and Land Management Plan							
Soil Management							
Linear infrastructure (roads and pipelines) must be inspected on a monthly basis to check that the associated water management infrastructure is effective in controlling soil erosion.	Construction/Operational		X			Monthly inspections of the surface infrastructure at Mortimer Smelter are carried out by the Environmental Officer. Comprehensive records are maintained to document these inspections, including details of any necessary actions taken and the status of corrections made.	Document 33, 35

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Soil for the purpose of rehabilitation must be stripped from areas to be cleared for construction and operation. This soil must be stockpiled and stored using the following conservation principles: - Usable soil must be stripped and stored with as little compaction as possible - Stockpile areas must have their soil stripped to conserve the seed bank - Single handling must be practised where possible - Stockpiles that are likely to remain undisturbed for 12 months or more must be revegetated to manage dust and erosion and to maintain the soil's viability. - Usable soil must be spread with as little compaction as possible - Land to which soil has been reapplied must be revegetated	Construction				X	No historical soil stockpiles were observed at the Mortimer Smelter site. Construction activities have been completed, and based on the lack of stockpiles, this condition is considered irrelevant and not subject to audit. Therefore, an undetermined finding is recorded.	
	Construction/Operational				X		
Contractors must construct berms after clearing of an area to minimise erosion.	Construction				X	Construction has concluded at Mortimer Smelter and as such this condition is no longer deemed applicable or auditable. Accordingly, an undetermined finding is noted.	
Biodiversity Management Plan							
Permits must be obtained from the relevant authority prior to the transportation of any rare / endangered species.	Construction				X	The Environmental Officer confirmed that there have been no encounters or need for relocation of fauna or flora species at Mortimer Smelter.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Ground and Surface Water Management							
Ensure that reticulation systems are properly maintained and regularly checked for blockages.	Operational		X			The Environmental Officer conducts monthly inspections of the surface infrastructure at Mortimer Smelter. Documentation is maintained to record the inspections, actions taken, and the status of any necessary corrections. Ms. Thato Moraope confirmed that the power lines within the trenches are being assessed for potential reallocation to improve maintenance procedures.	Document 33, 35
The Smelter must monitor water levels in the return water dams and take corrective action as required	Operational		X			The auditor reviewed the Fraser Dam flow report, which serves as evidence of the monitoring conducted to assess water levels at the Fraser Dam. This monitoring is implemented to minimize the risk of discharge and accidental spillage.	Document 49

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Stormwater management must be enhanced as follows: - Return water dams must be maintained and operated under supervision to ensure that maximum storage capacity is available to minimise discharge and subsequent impacts on the receiving water environment during storm events. - Stormwater must be monitored at the main discharge point during a rainstorm.	Operational	X				A Stormwater Management Plan and a recent Water Management Plan are in place at Mortimer Smelter Operation. The water levels of the Fraser Dam are monitored as part of these plans to minimize discharge and accidental spillage. Currently, a redesign of the water management system is underway to improve water management, including the installation of additional trenches and a proposed pump station. Water quality monitoring at the discharge point is conducted on a monthly basis, but it was noted that monitoring during rainstorm events is not currently conducted. This condition is practical and relevant to the current operation, as non-compliance poses a risk of potential contamination of surface and groundwater.	Document 18, 27
Contaminated runoff from the Smelters infrastructure must be diverted to the return water dams	Operational	X				The Mortimer Smelter encompasses a designated area for the management of dirty water, which includes trenches for collecting and directing the water to the Fraser Dam. It is important to note that not all areas designated for dirty water management have suitable collection systems, stormwater trenches, or control measures in place. Consequently, the	Document 17, 18, 27, 31 Picture 3 - 10

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						separation of clean and dirty water is not fully maintained. A GN 704 audit report conducted in June 2022 identified issues related to the management of clean and dirty water. During the audit, no designs were provided to confirm that the clean and dirty water systems and structures were designed in accordance with Regulation 704 of the National Water Act. Interviews with site representatives revealed that a feasibility study has been conducted to determine the requirements for redesigning the water management system. However, no progress has been made in implementing the proposed changes thus far. This condition is practical and relevant to the current operation, as non-compliance poses a risk of potential contamination of surface and groundwater.	
The existing monitoring points must be maintained to assess compliance with water quality guidelines	Operational		X			Mortimer Smelter has implemented a comprehensive surface and groundwater monitoring program in accordance with the Water Monitoring and Sampling Procedure. The monitoring activities are carried out in accordance with the specified procedure to ensure accurate and reliable data collection. Regular monitoring reports are generated based on the collected samples and measurements. The data obtained from the monitoring program is essential for assessing the quality of surface and groundwater at the Smelter. By following the specified procedure, Mortimer	Document 19, 27, 28

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						Smelter demonstrates its commitment to environmental stewardship and compliance with applicable regulations.	
Surface Water Management Plan							
The hydrology for the post closure scenario must be determined and if necessary, the dam capacity will have to be increased to allow for evaporation.	Closure/Post Closure			X		Based on the current operational phase of Mortimer Smelter, it is determined that no immediate actions are required to address the specified conditions. The necessary measures and actions to be taken are noted by the Mortimer Smelter Representatives and will be implemented during the closure phase. This finding acknowledges that the conditions identified are relevant to the future closure of the facility and may require specific actions and considerations at that stage. The Mortimer Smelter Representatives are aware of these conditions and will ensure their proper implementation when the closure process commences.	
The return water dams must become evaporation facilities.	Closure			X			
On closure the cells must be covered with 150mm of soil and revegetated.	Closure			X			
Groundwater Management Plan							
Seepage from the return water dams must be intercepted and pumped back to the return water system.	Operational/Closure	X				During the audit, no documentation was provided to demonstrate that seepage is being intercepted and pumped back to the return water dam at Mortimer Smelter. An extensive project initiated in 2021 aims to design and construct toe drains for the Slag Dump and to investigate seepage control and lining for the Fraser Dam. However, no evidence of progress or implementation was available at the time of the audit. An Official communication to DWS was	Document 18, 70

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						presented to the auditor that took place on 10 January 2025, discussing the way forward to address the pollution plume resulting from seepage from the Mortimer Smelter TSF, as according to the studies completed, the pollution occurring is not resulting from the Return Water Dam. However, until an official decision is made on the issue and the condition is amended to reflect as such, the auditor has determined the condition to be non-complaint.	
Hydrogeological assessment to investigate the extent of the contaminant plume emanating from the return water dams and downstream users.	Operational		X			In August 2020, a detailed Groundwater Liability Assessment was performed at Mortimer Smelter and Siyanda Bakgatla Platinum Mine. This assessment included an updated hydrocensus and an evaluation of the contaminant plume from the return water dams affecting downstream users.	Document 30

Table 8: Mortimer Smelter Sulphur Dioxide Abatement Project EMPr - 41103087

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Topography							
Restrict all activities, materials, equipment and persons within the area/s specified.	Construction/Closure				X	At the time of the audit, no construction activities were taking place as the project has been placed on hold. No activities, equipment, materials, or persons related to the project were identified on site.	
Erect and maintain permanent and/or temporary barricading prior to starting construction.	Construction/Closure		X			At the time of the audit, permanent barricading was observed to be implemented around the proposed facility footprint.	Picture 37
Maintain all demarcation barriers for the duration of construction activities.	Construction		X			Suitable permanent fencing was observed to be in place during the audit.	Picture 37
All excavations must be backfilled to the natural surface level; if a bulk factor exists it must be accommodated on the total area of disturbance.	Construction/Closure		X			At the time of the audit no excavations related to the construction activities placed on hold were observed at the time of the audit.	
Stockpiles created during the construction phase must not remain in the operation phase of the project	Construction/Closure		X			At the time of the audit, no stockpiles related to the construction activities completed to date were observed by the auditor.	
Sustainable erosion control measures (for wind and water erosion) must be implemented and maintained where necessary in areas disturbed by the construction / demolition operations	Construction/Closure		X			At the time of the audit no erosion was noted by the auditor. All areas disturbed during the construction phase that has been placed on hold has been stabilised.	Picture 37, 38, 39
All structures comprising the site establishment are removed from the site and surrounding areas	Construction		X			At the time of the audit, it was noted that the contractor has decamped from the site and all structures comprising the site establishment have been removed from the site and surrounding areas.	
All rubble is removed from the site and reused as far as possible to obtain zero-waste-to-landfill. Landfilling will only be done as a last resort.	Construction		X			At the time of the audit, no rubble was observed on site.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Fences, barriers and demarcations associated with the construction phase are removed from the site.	Construction		X			At the time of the audit, no temporary fences barriers and demarcations associated with the construction phase was observed by the auditor.	
Climate							
Fuel switching, substituting LPG for biodiesel must be investigated.	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore no fuel was being used or being switched or substituted.	
Solar Photovoltaic as an energy source must be investigated.	Construction/ Operational				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the investigation for solar energy has been placed on hold.	
Operations of the SO ₂ Abatement Plant must be incorporated within the ECO2MAN programme and that a greenhouse gas management hand book is developed for the smelting facility as a whole, this will not be a standalone document and will be as per the ECO2MAN* programme	Construction/ Operational		X			Although the project has been placed on hold, Mortimer Smelter provided evidence that the SO ₂ Abatement plant has been incorporated into the ECO2MAN programme. Additionally, a greenhouse gas management handbook (SHE Playbook) has been developed for the entire facility.	Document 62
Hazardous Materials							
Environmental conditions must be included in any construction contracts, thereby making contractors accountable for preventing accidental spillages by the implementation ISO 14001 practices.	Construction/Closure				X	At the time of the audit, no construction or closure activities were taking place as the project has been placed on hold, therefore no contracts are being implemented and the condition could not be assessed.	
All incidents must be reported to the responsible site officer as soon as they occur.	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	
In the event of an incident the Emergency Preparedness and Response Plan must be followed.	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Adherence to Mortimer Smelter's Environmental policy, Environmental procedures and values must be included in any construction contracts, thereby making contractors accountable for preventing accidental spillages by the implementation of good housekeeping practices.	Construction/Closure				X	At the time of the audit, no construction or closure activities were taking place as the project has been placed on hold, therefore no contracts are being implemented and the condition could not be assessed.	
All earth moving vehicles and equipment must be regularly maintained to ensure their integrity and reliability. No repairs may be undertaken beyond the contractor lay down area. All repairs are to be performed on an impervious surface.	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	
Storage areas and vehicle maintenance areas must have appropriate containment measures in place, including bunds, concrete, canals, collector drains and interception trenches.	Construction/ Operational/ Closure				X	No storage areas or vehicle maintenance areas had been constructed for the construction phase at the time of the audit, so the condition could not be assessed.	
All hazardous substances must be stored on an impervious surface in a designated bunded area, able to contain 110 % of the total volume of materials stored at any given time. Storage areas must be well marked with appropriate signage.	Construction/ Operational/ Closure				X	No hazardous substance associated with the project were observed on site at the time of the audit.	
If a spillage of a hazardous material occurs the resultant hazardous waste must be cleaned up using absorbent material provided in spill kits on site and disposed of in a designated hazardous waste bin.	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	
Any incidents must be reported as soon as possible. Measures must be put in place to prevent similar	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
incidences from occurring. If necessary, remediation of any contamination must be carried out.							
Spilled material must be cleaned up and disposed of appropriately as soon as practically possible.	Construction/ Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	
All hazardous waste will be stored in designated, lined and bunded areas (for no longer than 90 days) before it is removed from site and treated in line with an approved zero-waste-to-landfill offtake. Disposal at a registered hazardous waste disposal facility will be done as a last resort.	Construction/ Operational/ Closure				X	At the time of the audit, no waste is being produced associated with the project, therefore the condition could not be assessed.	
Records of all waste being taken off site must be recorded and kept as evidence.	Construction/ Operational/ Closure				X	At the time of the audit, no waste is being produced associated with the project, therefore the condition could not be assessed.	
Sustainable erosion control measures (for wind and water erosion) must be implemented and maintained where necessary in areas disturbed by the construction / demolition operations.	Construction/Closure		X			At the time of the audit no erosion was noted by the auditor.	Picture 37, 38, 39
To reduce dust entrainment, water or an appropriate dust suppressant must be sprayed on topsoil stockpiles until such time as the topsoil stockpiles have been revegetated.	Construction/Closure		X			At the time of the audit, the topsoil stockpiles were revegetated and did not require water suppressants.	Picture 39
Volumes of stockpiled materials must be accurately recorded. Records must be made available on request.	Construction/Closure		X			Evidence of volumes of stockpiles being monitored when construction was occurring was recorded and presented to the auditor.	Document 63
The Rehabilitation Plan must be aligned to the local SDF's.	Construction/ Operational/ Closure/ Post closure		X			A Post Closure Rehabilitation Plan for Mortimer Smelter was presented to the auditor. The rehabilitation plan demonstrated	Document 64

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
						alignment with the local SDF by setting goals to achieve agricultural sustainability post-closure.	
Ensure closure and rehabilitation is undertaken as part of the closure and rehabilitation plans.	Post closure				X	The condition relates to the Post-closure phase and could not be assessed at the time of the audit.	
The rehabilitation fund must be upgraded or revised on an annual basis according to the surveyed plan, which indicates the progress in rehabilitation.	Post closure				X	The condition relates to the Post-closure phase and could not be assessed at the time of the audit.	
Flora							
Contractors are to be trained on environmental awareness and the importance of preserving indigenous fauna and flora.	Construction				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	
Ensure that all site disturbances are limited to areas where structures will be constructed / removed.	Construction		X			During the audit, activities were noted to be confined to the areas where construction activities occurred. No additional disturbances were observed.	Picture 37, 38
Natural flora species are not to be used as firewood.	Construction/ Operational/ Closure/ Post closure		X			No firewood was observed being harvested from natural vegetation during the audit. Additionally, no construction workers were on site at the time of the audit as the project has been placed on hold.	
Following construction, exposed areas must be rehabilitated with topsoil / subsoil, or a suitable alternative and re-vegetated.	Construction				X	The condition could not be assessed during the audit as the project was placed on hold. The construction camp area remains surfaced with stone and has not been rehabilitated as the contractor may return and continue with the project at any date.	
On completion of the construction phase, disturbed areas must be graded and topsoiled, or covered with a suitable alternative. The topsoiled areas must then be re-vegetated using indigenous pasture species. In general, re-	Construction/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. The construction camp area remains surfaced with stone and has not been rehabilitated as the contractor may return and continue with the project at any date.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
vegetation must be undertaken using a mixture of commercially available seeds that will germinate reliably (high seed viability). The species used must be selected on the basis of their ability to bind and cover soil, (to afford effective erosion protection) and their tolerance of the prevailing environmental conditions.							
Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events. This will also reduce the likelihood of encroachment by alien invasive plant species.	Construction				X	The condition could not be assessed during the audit as the project was placed on hold. The construction camp area remains surfaced with stone and has not been rehabilitated as the contractor may return and continue with the project at any date.	
A number of different methods of re-vegetation are available (e.g. hydroseeding, hand seeding and hand sowing) and an appropriate method must be selected by Mortimer Smelter or the contractor.	Closure				X	The condition relates to the Closure phase and could not be assessed at the time of the audit.	
Following re-vegetation, the site must be monitored and maintained until a sound vegetation cover that will prevent erosion, has been achieved	Construction/ Operational/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. The construction camp area remains surfaced with stone and has not been rehabilitated as the contractor may return and continue with the project at any date.	
Compilation of and implementation of an alien vegetation management plan for the entire site. The plan must be implemented quarterly for 2 years after phase, for the adjacent vegetated areas.	Construction/ Operational/ Closure/		X			Evidence was provided to the auditor confirming that an ongoing monitoring and eradication program is implemented for the Mortimer Smelter Site according to the Alien Invasive Management Plan.	Document 65
A monitoring programme must be implemented that must ensure that all weeds and alien species be eradicated in and around the project area. Monitoring must be done according to the Biodiversity Action Plan for the region.	Construction/ Operational/ Closure/ Post closure		X			Evidence was provided to the auditor confirming that an ongoing monitoring and eradication program is implemented for the Mortimer Smelter Site according to the Alien Invasive Management Plan.	Document 65

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Eradication and monitoring of alien plants must be done on an ongoing basis during the life of Mortimer Smelter and following rehabilitation, until self- sustaining vegetation cover, as close as practicably possible to the composition and density of the pre- mining vegetation cover is achieved.	Construction/ Operational/ Closure/ Post closure		X			Evidence was provided to the auditor confirming that an ongoing monitoring and eradication program is implemented for the Mortimer Smelter Site according to the Alien Invasive Management Plan.	Document 65
Roads to and on the site must serve as suitable firebreaks for part of the area. Tall grass along the edges of the roads must either be mowed or burned shortly prior to the onset of the dry season. Where no roads are available to serve as firebreaks, special firebreaks must be established each season. These could either be strips approximately 6m wide which have been mowed (or grazed) and ploughed, or specially burned firebreaks.	Construction/ Operation		X			During the audit, it was noted that roads served as firebreaks, with no tall grass along the edges. Roads adjacent to the site boundary are used for security patrols, and no areas without roads were observed.	Picture 23
No unnecessary destruction of vegetation must be allowed and, in particular, construction workers must not be allowed to harvest any trees for use as firewood or any other purpose.	Construction		X			No firewood was observed being harvested from natural vegetation during the audit. Additionally, no construction workers were on site at the time of the audit as the project has been placed on hold.	
Mortimer Smelter must limit, as far as practical, the area of land disturbed and isolated for the purpose of construction, mining and processing activities, to the minimum required for safe and efficient operation.	Construction/ Operation		X			Activities were noted to be confined to the required construction areas during the audit, with no additional disturbances observed.	Picture 37, 38
The disturbed areas must be rehabilitated.	Construction/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. The construction camp area remains surfaced with stone and has not been rehabilitated as the contractor may return and continue with the project at any date.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Existing access routes must be made use of.	Construction/ Operational/ Closure		X			Only existing routes were observed to have been used at the time of the audit and no additional access routes were noted by the auditor.	Picture 10
A fire management plan needs to be complied with and implemented to restrict the impact fire might have on the surrounding areas.	Construction/ Operational/ Closure		X			An emergency preparedness and response plan has been developed that covers all fire emergencies and is implemented at Mortimer Smelter	Document 13
Fauna							
Contractors are to be trained on environmental awareness and the importance of preserving indigenous fauna and flora.	Construction/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed as no contractors are on site.	
Staff should be educated about the sensitivity of faunal species and measures should be put in place to deal with any species that are encountered during the construction process. The intentional killing of any animals including snakes, lizards, birds or other animals should be strictly prohibited.	Construction/ Operational/ Closure		X			Evidence was presented to the auditor showing training conducted for Mortimer Smelter employees on Fauna and Flora Management, with an attendance register signed as proof of training.	Document 15
Ensure that all site disturbances are limited to areas where structures will be constructed / removed.	Construction		X			During the audit, activities were noted to be confined to the areas where construction activities are required. No additional disturbances were observed.	Picture 37, 38
If any faunal species of conservation importance are recorded during construction, activities should temporarily cease and an appropriate specialist should be consulted to identify the correct course of action.	Construction			X		The Holder confirmed that no faunal species of conservation importance had been recorded during construction.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Roads to and on the site must serve as suitable firebreaks for part of the area. Tall grass along the edges of the roads must either be mowed or burned shortly prior to the onset of the dry season. Where no roads are available to serve as firebreaks, special firebreaks must be established each season. These could either be strips approximately 6m wide which have been mowed (or grazed) and ploughed, or specially burned firebreaks.	Construction/ Operational		X			During the audit, it was noted that roads served as firebreaks, with no tall grass along the edges. Roads adjacent to the site boundary are used for security patrols, and no areas without roads were observed.	Picture 23
Mortimer Smelter must limit, as far as practical, the area of land disturbed and isolated for the purpose of construction, mining and processing activities, to the minimum required for safe and efficient operation.	Construction		X			During the audit, activities were noted to be confined to the areas where construction activities are required. No additional disturbances were observed.	Picture 37, 38
The disturbed areas must be rehabilitated.	Construction/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. The construction camp area remains surfaced with stone and has not been rehabilitated as the contractor may return and continue with the project at any date.	
Existing access routes must be made use of.	Construction/ Operational/ Closure		X			Only existing routes were observed to have been used at the time of the audit.	Picture 29
Air Quality							
All earth moving vehicles and equipment must be regularly maintained to ensure their integrity and reliability.	Construction/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. No earth moving vehicles and equipment related to the activities were observed on site by the auditor.	
There must be strict speed limits on dust roads to prevent dust entrainment into the atmosphere.	Construction		X			Speed limits were implemented on both surfaced and dirt roads to prevent dust entrainment into the atmosphere. No excessive dust was observed during the audit.	Picture 24

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Management procedures to ensure minimal disturbance can be employed during the construction and decommissioning phase to mitigate dust.	Construction/ Operational/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. No dust was being created related to the authorised activities.	
Employees must be issued with appropriate PPE.	Construction/ Operational/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. No employees related to the authorised activities were on site at the time of the audit.	
Performing construction and remediation activities over separate portions will reduce wind erosion of open land.	Construction/ Closure			X		The Holder confirmed that no remediation activities had occurred yet at the time of the audit.	
Wet suppression and wind speed reduction are common methods used to control open dust sources at construction sites, as a source of water and material for wind barriers tend to be readily available.	Construction			X		The condition is noted by the holder. No management measure is stated in the condition of the EMPr, and no activities related to the EMPr were occurring at the time of the audit.	
Sustainable erosion control measures (for wind and water erosion) must be implemented and maintained where necessary in areas disturbed by the construction / demolition operations.	Construction/ Closure		X			At the time of the audit no erosion was noted by the auditor.	Picture 37, 38, 39
To reduce dust entrainment, water or an appropriate dust suppressant must be sprayed on topsoil stockpiles until such time as the topsoil stockpiles have been re-vegetated	Construction		X			At the time of the audit, the topsoil stockpiles were revegetated and did not require water suppressants.	Picture 39
It is recommended that wet suppression and wind speed (windbreaks, wind covers or barriers) reduction mitigation techniques are employed throughout the duration of the construction and decommissioning phases.	Construction/ Closure				X	At the time of the audit, no activities were taking place related to the authorised project and hence the condition could not be assessed.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
General control methods for open dust sources, as recommended by the US EPA, are given in Table 44 of the impact assessment report.	Construction/ Closure			X		The Holder confirms that general control methods for open dust sources, as recommended by the US EPA, will be considered.	
It is recommended that existing and proposed mitigation techniques are maintained and that abatement machinery is regularly serviced according to supplier specifications.	Construction/ Operational/ Closure			X		The Holder confirms that the proposed mitigation techniques will be maintained and that abatement machinery will be regularly serviced according to supplier specifications upon completion of the construction phase.	
It is recommended that PM10, SO2 and dust fallout monitoring is continued to assess ambient concentrations and dust fallout levels.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
It is recommended that point source and fugitive emissions impacts from the furnace building be monitored to accurately determine, and better understand, the potential impacts on ambient air quality. It is recommended that this is done as per the existing ambient air quality monitoring programme.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Surface Water							
All earth moving vehicles and equipment must be regularly maintained to ensure their integrity and reliability. No repairs may be undertaken beyond the contractor lay down area. All repairs are to be performed on an impervious surfaces.	Construction/Operational/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. No earth moving vehicles and equipment related to the activities were observed on site by the auditor.	
The SO ₂ Abatement Plant must be underlain by concrete to minimise seepage except at offices, walkways and access roads.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Polluted water (effluent and contaminated runoff) must be directed to a containment pond.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Seepage must be collected in perimeter drains, which flow to the return water dams for reuse.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Storage areas and vehicle maintenance areas must have appropriate containment measures in place, including bunds, concrete, canals, collector drains and interception trenches.	Construction/Operational/ Closure				X	No storage areas or vehicle maintenance areas had been constructed for the construction phase at the time of the audit, so the condition could not be assessed.	
All hazardous substances must be stored on an impervious surface in a designated bunded area, able to contain 110 % of the total volume of materials stored at any given time. Storage areas must be well marked with appropriate signage.	Construction/Operational/ Closure				X	No hazardous substance associated with the project were observed on site at the time of the audit.	
If a spillage of a hazardous material occurs the resultant hazardous waste must be cleaned up using absorbent material provided in spill kits on site and disposed of in a designated hazardous waste bin.	Construction/Operational/ Closure				X	At the time of the audit no activities related to the project were occurring, and hence the condition could not be adequately assessed.	
Any incidents must be reported as soon as possible. Measures must be put in place to prevent similar incidences from occurring. If necessary, remediation of any contamination must be carried out.	Construction/Operational/ Closure				X	At the time of the audit, no activities related to the authorised project were occurring and hence no incidents have been reported or addressed accordingly.	
Spilled material must be cleaned up and disposed of appropriately as soon as practically possible.	Construction/Operational/ Closure				X	At the time of the audit no activities related to the project were occurring, and hence the condition could not be adequately assessed.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
All hazardous waste will be stored in designated, lined and bunded areas (for no longer than 90 days) before it is removed from site and treated in line with an approved zero-waste-to-landfill offtake. Disposal at a registered hazardous waste disposal facility will be done as a last resort.	Construction/Operational/ Closure				X	At the time of the audit, no waste skips were observed on site as the project has been placed on hold.	
Records of all waste being taken off site must be recorded and kept as evidence.	Construction/Operational/ Closure				X	At the time of the audit, no waste is being produced associated with the project, therefore the condition could not be assessed.	
A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that, it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site. Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on-site unless necessary. All contaminated soil/yard stone shall be treated in situ or removed and be placed in containers. Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.	Construction/Operational/ Closure				X	Mortimer Smelter has implemented a hydrocarbon spill management plan. It should however be noted that during the audit, no contractor was based on-site conducting activities related to the project.	Document 9
Groundwater							
All earth moving vehicles and equipment must be regularly maintained to ensure their integrity and reliability. No repairs may be undertaken beyond the contractor lay down	Construction/Operational/ Closure				X	The condition could not be assessed during the audit as the project was placed on hold. No earth moving vehicles and equipment related to the activities were observed on site by the auditor.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
area. All repairs are to be performed on an impervious surface.							
The SO ₂ Abatement Plant must be underlain by concrete to minimise seepage except at offices, walkways and access roads.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Polluted water (effluent and contaminated runoff) must be directed to a containment pond.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Seepage must be collected in perimeter drains, which flow to the return water dams for reuse.	Construction/Operational/ Closure				X	The condition could not be assessed at the time of the audit as no seepage and perimeter drains had been constructed.	
Storage areas and vehicle maintenance areas must have appropriate containment measures in place, including bunds, concrete, canals, collector drains and interception trenches.	Construction/Operational/ Closure				X	No storage areas or vehicle maintenance areas had been constructed for the construction phase at the time of the audit, so the condition could not be assessed.	
All hazardous substances must be stored on an impervious surface in a designated bunded area, able to contain 110 % of the total volume of materials stored at any given time. Storage areas must be well marked with appropriate signage.	Construction/Operational/ Closure				X	No hazardous substance associated with the project were observed on site at the time of the audit.	
If a spillage of a hazardous material occurs the resultant hazardous waste must be cleaned up using absorbent material provided in spill kits on site and disposed of in a designated hazardous waste bin.	Construction/Operational/ Closure				X	At the time of the audit, no construction, operational or closure activities were taking place as the project has been placed on hold, therefore the condition could not be assessed.	
Any incidents must be reported as soon as possible. Measures must be put in place to prevent similar incidences from occurring. If necessary, remediation of any contamination must be carried out.	Construction/Operational/ Closure				X	At the time of the audit, no activities related to the authorised project were occurring and hence no incidents have been reported or addressed accordingly.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Spilled material must be cleaned up and disposed of appropriately as soon as practically possible.	Construction/Operational/ Closure				X	At the time of the audit no activities related to the project were occurring, and hence the condition could not be adequately assessed.	
All hazardous waste will be stored in designated, lined and bunded areas (for no longer than 90 days) before it is removed from site and treated in line with an approved zero-waste-to-landfill offtake. Disposal at a registered hazardous waste disposal facility will be done as a last resort.	Construction/Operational/ Closure				X	At the time of the audit, no waste skips were observed on site as the project has been placed on hold.	
Records of all waste being taken off site must be recorded and kept as evidence	Construction/Operational/ Closure				X	At the time of the audit, no waste is being produced and removed from site as the project has been placed on hold.	
The infrastructure must be dismantled and removed on closure.	Closure				X	The condition relates to the Closure phase and could not be assessed at the time of the audit.	
A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that, it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site. Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment on-site unless necessary. All contaminated soil/yard stone shall be treated in situ or removed and be placed in containers. Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.	Construction/Operational/ Closure				X	Mortimer Smelter has implemented a hydrocarbon spill management plan. It should however be noted that during the audit, no contractor was based on-site conducting activities related to the project.	Document 9

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Noise							
Additional (i.e more recent) monitoring, on the fence line and at receptors, are to be undertaken, as the data is not fully representative of the current baseline (i.e outdated).	Construction/Operational/ Closure		X			An Environmental Noise Assessment was conducted, which included the boundary and sensitive receptors in 2025.	Document 38
Bi-annual noise monitoring is to be undertaken on the fence line and at receptors.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Employees must be issued with appropriate PPE.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Cultural Heritage							
Should any archaeological artefacts be exposed during construction, activities in the vicinity of findings must be stopped immediately. Under no circumstances shall any artefact be destroyed. Such an archaeological site must be marked and fenced off, and the South African Heritage Agency must be contacted immediately. If these appear to be human remains the South African Police Service will also be contacted.	Construction			X		At the time of the audit, the Holder confirmed that no archaeological artefacts had been exposed during construction. The Holder assured that if any artefacts are discovered, the area will be cordoned off, and the South African Heritage Agency will be contacted immediately.	
Prior to closure an assessment of all structures on site must be undertaken in order to determine their heritage importance.	Closure				X	The condition relates to the Closure phase and could not be assessed at the time of the audit.	
Socio-Economic							
Should unskilled labour be required during the construction phase, this should be sourced from the local communities. This requirement must be specified within the contract signed by the contractor.	Construction				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
AAP is to ensure that any new or replacement employment and procurement opportunities maximise benefits to local communities.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Local entrepreneurs and previously disadvantaged contractors must be provided preferential opportunities to tender for contracts.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Local recruitment must take place through the tribal recruitment office and with the knowledge of mutually agreed community structures and recruitment channels / mechanisms.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Sub-contractors must sign a compliance agreement with regards to local employment.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Sub-contractors must submit labour returns to verify local recruitment.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Mortimer Smelter must keep records of the number of local people employed, place of residence, recruitment office, job descriptions, length of service and opportunities for career development. Sub-contractors to Mortimer Smelter must keep similar records for all placements of local people.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Recruitment must favour local employment and skills training. Mortimer Smelter must establish skills training programmes for locals to address Mortimer Smelter's	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
needs and to promote small, medium and micro enterprise (SMME) development.							
Mortimer Smelter must assist with the administration of the tribal recruitment office. This includes the facilitation of local skills audits, baseline data and the development of socio-economic databases.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Currently, AAP has a local recruitment and procurement policy in place, which their contractors must adhere to and provide evidence thereof. This may be enhanced through consultation with local communities and leadership, as well as the Department of Labour. This engagement may include ascertaining the local skills levels and providing information on general and scarce skills needs, as well as procurement opportunities available at the AAP facility. This process would aim at encouraging local communities to develop skills for future employment at the Mortimer Smelter operations.	Construction/Operational/ Closure/ Post closure			X		The condition is noted by the Holder, who has confirmed that they will continue to work with the local tribal office and the Department of Labour to ensure the development of local skill levels.	
The establishment of a Stakeholder Engagement Forum, with representatives from local community (including informal communities) is recommended. This should be developed into a structure to promote on-going discussions, and ensure actions are taken by AAP, the local communities, traditional leadership and the local municipality to ensure that issues raised are resolved over time.	Construction/Operational/ Closure/ Post closure			X		The Holder acknowledges the condition and has confirmed that Stakeholder Engagement Forums are already in place and will continue to participate in these forums.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
The outcomes of regular meetings should be tracked and managed to ensure that the information shared at forum meetings is meaningful and actions are implemented by the relevant parties.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, the project has been placed on hold and the Smelter is in Care and Maintenance, hence the representatives have confirmed no community forum meetings are occurring.	
AAP must identify ways in which they can improve their engagement with stakeholder through other existing forums, improved communication and regular feedback mechanisms.	Construction/Operational/ Closure/ Post closure			X		The Holder acknowledges the condition and has confirmed that they will identify ways to improve their engagement with stakeholders.	
Principles of equality, BEE, gender equality and non-discrimination must be implemented.	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no employees are working on site related to the authorised activities and hence the condition could not be assessed at the time of the audit.	
Visual							
Use low wattage light bulbs where possible to reduce potential for light pollution.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Place focused lighting at low levels and direct on specific objects, areas, or activities to reduce potential for light pollution.	Construction/Operational/ Closure				X	At the time of the audit, no lighting within the construction area was noted.	
Use exterior paints and non-reflective finishes to minimise glare and reflection from built surfaces.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
The plant infrastructure must be dismantled at closure and the plant area rehabilitated in line with the rehabilitation plan.	Closure				X	The condition relates to the Closure phase and could not be assessed at the time of the audit.	
Health and Safety							
Compliance with applicable SANS codes, i.e. SANS 10087-3 (LPG), SANS 10400, SANS 10108, etc. must be demonstrated.	Construction/Operational/ Closure				X	At the time of the audit, the project has been placed on hold hence the condition cannot be assessed at the time of the audit.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
Incorporation of applicable guidelines or equivalent international recognised codes of good design and practice into the designs.	Construction/Operational		X			A Health and Safety Specification was presented to the auditor, describing the incorporation of applicable guidelines and equivalent internationally recognized codes of good design and practice into the designs of the SO ₂ abatement plant.	Document 66
Completion of a recognised process hazard analysis (such as a HAZOP study, FMEA, etc.) for the proposed facility prior to construction to ensure design and operational hazards have been identified and adequate mitigation put in place.	Construction/Operational		X			A Construction Baseline Health and Safety Risk Assessment, a Health and Safety Specification, and the Concrete Standard and Masonry Specification were provided to the auditor as evidence that the risks associated with construction and operational hazards are mitigated.	Document 66 Document 67 Document 68
Preparation and issue of a safety document detailing safety and design features of the design for reducing the impacts from toxic releases, loss of containment, fires, explosions and flammable atmospheres to form part of the required input to a quantitative risk assessment: — including compliance to statutory laws, applicable codes and standards and world's best practice — including the listing of statutory and non-statutory inspections, giving frequency of inspections — including the auditing of the built facility against the safety document — noting that codes such as IEC 61511 can be used to achieve these requirements	Construction/Operational/ Closure				X	At the time of the audit, the project has been placed on hold hence the condition cannot be assessed at the time of the audit.	
Demonstration by AAP or their contractor that the final designs would reduce the risks posed by the installation to internationally acceptable guidelines.	Construction				X	At the time of the audit, the project has been placed on hold hence the condition cannot be assessed at the time of the audit.	
Sign-off for all SO ₂ Abatement Project designs by a professional engineer registered in South Africa in	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
accordance with the Professional Engineers Act, who takes responsibility for suitable designs.							
Completion of an emergency preparedness and response document for on-site and off-site scenarios prior.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Permission not being granted for increases to the product list or product inventories without redoing part of or the full EIA.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Final acceptance of the facility risks for all the retained AAP operations at Mortimer with a quantitative risk assessment that must be completed in according to a process based on a process similar to the one required for to the MHI regulations.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
The sulphuric acid storage, pumping and road tanker loading areas must be provided with bunds (secondary containment) to contain spillages.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Level indication and controls are to be installed to prevent overfilling of the acid storage tanks and when loading acid road tankers.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Gantries and loading arms for the loading of sulphuric acid tankers are to be maintained.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
The effluent plant must be bunded to prevent lime slurry and untreated effluent streams from entering the environment.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
The bypass of furnace off-gas to the stack in extreme instances must be considered to reduce the impact of loss of primary containment of process gases in the WSA.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
SO ₂ /SO ₃ monitoring and shutdown procedures must be developed and implemented as per the HAZOP.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Regular inspection and maintenance of ducting and equipment must be undertaken.	Operational				X	The condition relates to the Operational phase and could not be assessed at the time of the audit.	
Waste Generation							
A minimum of one toilet must be provided per 10 persons. Portable toilets (if used) must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area.	Construction				X	At the time of the audit, no employees related to the authorised activities were occurring as the project has been placed on hold and hence no toilets were on site at the time of the audit.	
Where a registered disposal facility is not available close to the project area, the Contractor shall provide a method statement concerning waste management. Under no circumstances may domestic waste be burned on site.	Construction/Operational/ Closure				X	As no construction is taking place, no waste is being produced on site that requires disposal. It should however be noted that the registered Halfontein Waste Facility was identified for waste disposal for the facility as a whole. No waste was observed being burned on site.	Document 69
Refuse bins will be emptied and secured Temporary storage of domestic waste shall be in covered waste skips. The maximum domestic waste storage period will be 10 days.	Construction/Operational/ Closure				X	As no construction is taking place, no waste is being produced on site no refuse bins were on site.	Document 69
Environmental Awareness Training							
All personnel and contractors to undergo Environmental Awareness Training. A signed register of attendance must be kept for proof. Discussions are required on sensitive environmental receptors within the project area to inform contractors and site staff of the presence of Red / Orange List species, their identification, conservation status and importance, biology, habitat requirements and	Construction/Operational/ Closure/ Post closure				X	At the time of the audit, no activities related to the authorised activities were taking place on site and hence no employees or contractors related to the activity were on site.	

MONITORING ACTIONS	Applicable Phase	NC	C	N	UD	COMMENTS	REF
management requirements the Environmental Authorisation and within the EMPr. The avoidance and protection of the wetland areas must be included into a site induction. Contractors and employees must all undergo the induction and made aware of the “no-go” to be avoided.							

ANNEXURE B: DOCUMENT AND FIGURE REFERENCES

RECORDS REVIEWED	
1	Mortimer Smelter Water Use Licence (07/A24E/CGG/10781)
2	Slag Dump Waste Declassification (Ref EDMS 190424)
3	Atmospheric Emission Licence (AEL) 2020-10-02
4	Atmospheric Emissions Survey Report (C&M Consulting Engineers, April 2025)
5	Ambient Air Quality Monitoring Report (C&M Consulting Engineers, April 2025)
6	Hazardous Waste Generator Certificate (D12971-01)
7	Disposal Certificates Sample, Enviroserve, July 2025
8	Disposal Volumes spreadsheet (Updated July 2025)
9	Spill Handling Procedure (MSM-ALL-ENV-PRO-0006)
10	Incident Investigation, Non-Conformity, Corrective and Preventative Action Procedure (MSM-ALL-SHE-PRO-0011)
11	Annual Rehabilitation, Decommissioning and Closure Plan (SRK Consulting, December 2024)
12	Electronic version of the EMPr (WSP, 2021)
13	Emergency Preparedness and Response Procedure (MSM-ALL-SHE-COP-0001)
14	Training, Awareness and Competence Procedure (MSM-ALL-SHE-PRO-0005)
15	Various Talk and Safety Topics – 2025
16	Training Matrix Sample
17	Inspection and Cleaning of Trenches Procedure (MSM-ALL-ENV-PRO-0013)
18	Water Management Infrastructure Feasibility Study (Resonant, 2021)
19	Water Monitoring and Sampling Procedure (MSM-ALL-ENV-PRO-0007)
20	Infrastructure footprint map (SRK, 2018)
21	Agreenco Alien Invasive Eradication closeout report (February 2022)
22	Invasive and Alien Plant Species Survey and Management Plan (ENVASS, 2020)
23	Series of monthly dust fallout monitoring reports, Aquatico, 2024
24	Mortimer Complaints Register 2025
25	Slag Handling Procedure (MSM-PRG-SME-PRO-0272)
26	Daily SO ₂ SCADA Measurements Sample
27	Series of Monthly Surface Water Quality Monitoring Reports, Aquatico 2025
28	Series of Quarterly Ground Water Quality Monitoring Report, Aquatico 2025
29	Groundwater exceedance investigation report 2022
30	Groundwater Liability Assessment (Delta H, 2018)
31	GN 704 Compliance Audit (ENVASS, 2022)
32	Mortimer Smelter Water Management Plan (Anglo American Platinum, 2022)
33	Maintenance Work Order (ENABLON)
34	Hydrogeological Study (SRK, 1996)
35	Incident and Corrective Action Register, Excel Sheet, Updated July 2025
36	Mortimer Smelter Water Balance Schematic

RECORDS REVIEWED	
37	Water Quality Variable Database 2024
38	Environmental Boundary Noise Assessment (SOHS, 2025)
39	Procurement Records 2025
40	Recruitment and Selection Procedure
41	Evidence of local SMME vendor appointments and project allocation.
42	Employment Equity Policy (CTR-GHR-GHR-POL-0024)
43	Memorandum of Understanding (SAPS & RPM, 2018)
44	Enviroserv Waste Transporter Certificate (GPT-00-057)
45	Mr. O. Dire Safety Officer Appointment (as per section 2.17.1)
46	SHE Policy 2025
47	Mortimer Slag Dump and Siyanda Site - Geochemical Assessment (Delta H, 2019)
48	Historic Risk Assessment and Rehabilitation Plan (WSP, 2015)
49	Fraser dam flow report (SRK, 2022)
50	Monthly Water Balance (MOYO)
51	Mortimer Smelter SLAM Dust Sweeping Records, June 2025
52	Business forum meeting attendance register 2024
53	Accountability Forum Meetings 2024
54	Contractor Social Management 20241
55	Aquatico Scientific SANAS Accreditation Certificate
56	World Aids Day (Mortimer Smelter, 2024)
57	Waste Management Procedure (MSM-ALL-ENV-PRO-0001)
58	Sample of medical examination
59	Pollution plume model update, 2021
60	Series of Air Quality Monitoring Reports, Aquatico 2025
61	MSDS for Dulux, Acrylic Paint, Dated 2021
62	SHE Playbook-OPSCO Energy GHG 2024 Operation
63	Daily Quantities (Volumes of stockpiles excel spreadsheet)
64	Post Closure Rehabilitation Plan for AAP/RPM: Mortimer Smelter (H366960-CA003-220-242-0001, Rev 1)
65	Alien Invasive Management Plan (AIM-REP-113-20_21 0.2), ENVASS, March 2024
66	Health and Safety Specification (H366960-100-110-242-0001), Hatch, November 2022
67	Construction Baseline Health and Safety Risk Assessment (H366960-100-110-003-0001), Hatch, June 2023
68	Concrete Standard and Masonry Specification (H366960-100-231-242-0002), Hatch, March 2023
69	Halfontein Waste Management Facility Registration (12/9/11/L210831113621/3/R)
70	Progress Update – Mortimer Smelter, Dated 10 January 2025

VISUAL REFERENCES



Picture 1: Spill kit (1)



Picture 2: Spill kit (2)



Picture 3: Damaged trench



Picture 4: Silted trench with vegetation growth



Picture 5: Silted trench



Picture 6: Silted trench with vegetation growth



Picture 7: Pooling water



Picture 8: Leaking process water



Picture 9: Sedimented bund in the process of cleared



Picture 10: Water flowing in plant



Picture 11: Bunded Diesel storage tank



Picture 12: Drip trays available for use



Picture 13: Diesel storage bay (1)



Picture 14: Diesel storage bay (2)



Picture 15: Bunded paint stores



Picture 16: Bunded hazardous waste storage



Picture 17: Employees with issued PPE



Picture 18: Good housekeeping (1)



Picture 19: Good housekeeping (2)



Picture 20: Access road



Picture 21: Site fencing



Picture 22: Internal Road and Weighbridge



Picture 23: Site boundary & haul road with short vegetation



Picture 24: Road traffic signage



Picture 25: Slag Dump



Picture 26: Buildings painted in non-reflective, natural colours.



Picture 27: Roof structure painted



Picture 28: Infrastructure painted



Picture 29: Access control and weighbridge



Picture 30: Waste storage area access control & signage



Picture 31: Waste separation dustbins (1)



Picture 32: Waste separation dustbins (2)



Picture 33: Waste separation dustbins (3)



Picture 34: Workshops fitted with clean and dirty water separation



Picture 35: Oil spillage at oil store.



Picture 36: Oil spillage near stormwater outlet channel.



Picture 37: SO₂ facility fencing.



Picture 38: Cemented stabilised surface of the SO₂ facility construction area.



Picture 39: Vegetated topsoil stockpile.