

RUSTENBURG PLATINUM MINES LIMITED

MOTOTOLO MINE COMPLEX

2025 Annual Environmental Compliance Audit: *Borwa Ventilation Shafts, Emulsion Borehole and Overhead Line (Oct 2022) and Environmental Authorisation (Jun 2023)* Reference Number: LP 30/5/1/2/3/2/1 (0182) EM

COMPILED FOR



COMPILED BY

Report #: MOTDB04-MOTM-BVS-BAR05



Report Date: 9 December 2025



REPORT REVISIONS

REPORT REVISION #	DATE ISSUED	REPORT PURPOSE
MOTDB04-MOTM-BVS-BAR01	31 October 2025	Draft issued for external peer review
MOTDB04-MOTM-BVS-BAR02	3 November 2025	Updated Draft issued for client review
MOTDB04-MOTM-BVS-BAR03	3 December 2025	Updated Draft including client comments
MOTDB04-MOTM-BVS-BAR04	8 December 2025	Final including additional comments
MOTDB04-MOTM-BVS-BAR05	9 December 2025	Final for submission

DECLARATION OF INDEPENDENCE

This report was compiled by Jeannine Nienaber, Manager of J9 CC t/a J9Enviro® (J9).

This report was reviewed by Reneé Steele, Director of Steele Environmental Consulting (Steele).

J9 and Steele are both independent environmental consultants and auditors, and have performed the duties of auditors in an objective manner. Both auditors have acquired the expertise in conducting environmental auditing, including knowledge of the applicable environmental legislation, regulations, and guidelines. J9 and Steele have no business, financial, personal or other interest, in the operation for which they were appointed to do an assessment. There are no circumstances that may compromise the objectivity of J9, nor Steele, in performing this work.

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Signed on behalf of J9 CC t/a J9Enviro®

Signed on behalf of Steele Environmental Consulting

Jeannine Nienaber
Manager

Reneé Steele
Director



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1. INTRODUCTION

1.1 MOTOTOLO MINE COMPLEX BACKGROUND

Valterra Platinum Limited (Valterra) demerged from Anglo American plc, effective 31 May 2025. Valterra was previously known as Anglo American Platinum Limited (AAP). Rustenburg Platinum Mines Limited (RPM), a wholly owned subsidiary of Valterra, commenced planning the establishment of a new platinum group metals mine in the Der Brochen area of the Eastern Limb of the Bushveld complex in 2001. The Mototolo (*meaning mountain*) Platinum Mine was established as a 50/50 joint venture (JV) in August 2005. The joint venture was an operating mine, treating UG2 at 200 ktpm [100 ktpm from each of the two shafts, Borwa and Lebowa (*then Thorncliffe Mine shafts*)]. The planned Mototolo tailings storage facility (TSF) was moved from the originally selected farm Mareesburg 7 JT to the farm Helena 6 JT in 2005. A chrome extraction plant was authorised in 2006, within the footprint of the Mototolo concentrator. In November 2018, RPM acquired the 50% of Mototolo held by the JV partners, leading to the Mototolo JV becoming a wholly owned asset of the company. In 2020, RPM entered into a royalty mining agreement to access UG2 mining areas from Mototolo's Lebowa shaft to the north, adjacent to the Thorncliffe farm boundary.

Various studies followed with the aim of determining how best to exploit the total resource. The latest 2019-2020 Der Brochen Feasibility Study (FS) investigated the development of the infrastructure associated with the South shaft, together with ore handling systems at Der Brochen Mine. The FS was premised on the South shaft infrastructure being able to handle 200 ktpm at steady state, replacing the Lebowa shaft infrastructure, and construction is currently in progress. A decision was made in 2021 to consolidate the two operations, and the Mototolo Mine and Der Brochen Project, became the Mototolo Mine Complex (the Complex). The Complex is now fully owned and operated by RPM. The Complex is situated in the Limpopo Province of South Africa, just north of its border with Mpumalanga, about 35 km northwest of Mashishing (*formerly Lydenburg*), ~30 km northeast of Roossenekal and 30 km southwest of Steelpoort. The Complex is accessible via the R577 (*between Stofberg and Steelpoort*) via the tarred road to Mashishing, and is located on the southernmost exposure of the Eastern Limb of the Bushveld Geological Complex (**Figure 1**).

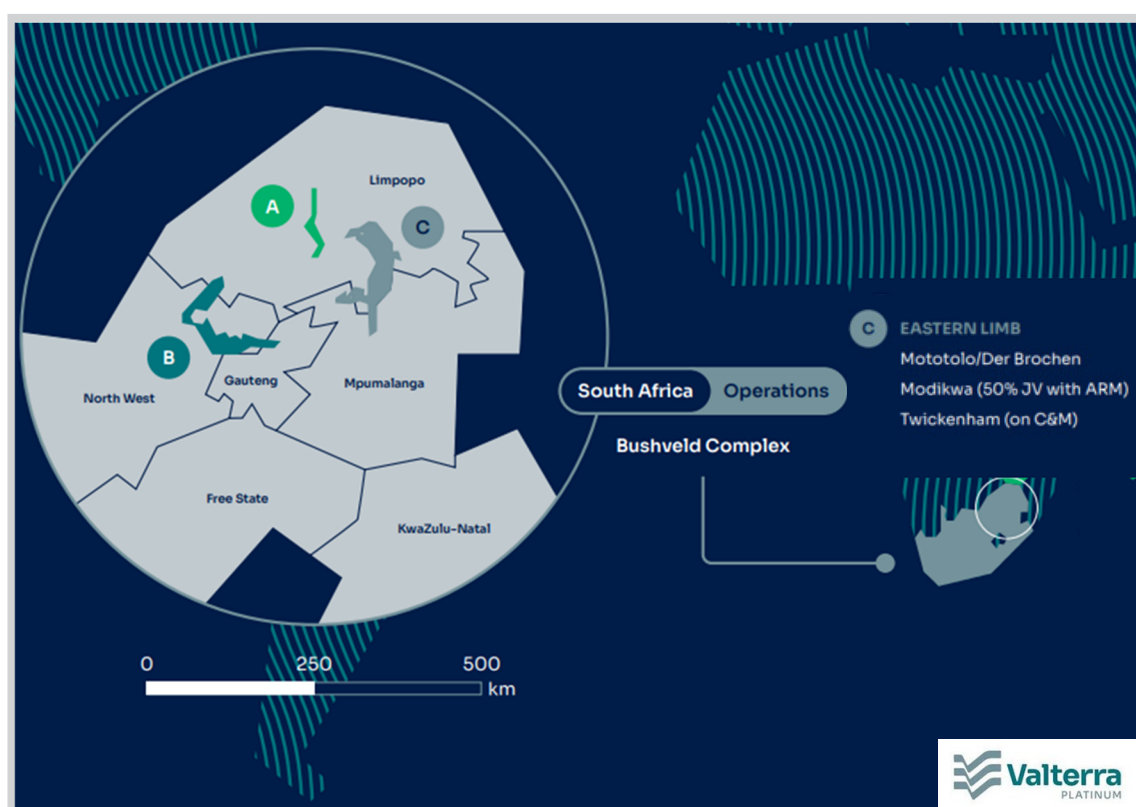


Figure 1: Location of the Mototolo Mine Complex



Figure 2 shows that the Mototolo Mine Complex comprises: the Lebowa and Borwa decline shafts, the Mototolo Concentrator and Chrome Recovery Plant, the Helena TSF (*tailings deposition has ceased*), Maresburg TSF (*operational, with additional phases under construction*) and the Der Brochen Mine (*South Shaft Project under construction, with the initial ore being trucked to the Mototolo Concentrator for processing, and the northern area including construction activities and operational infrastructure*).

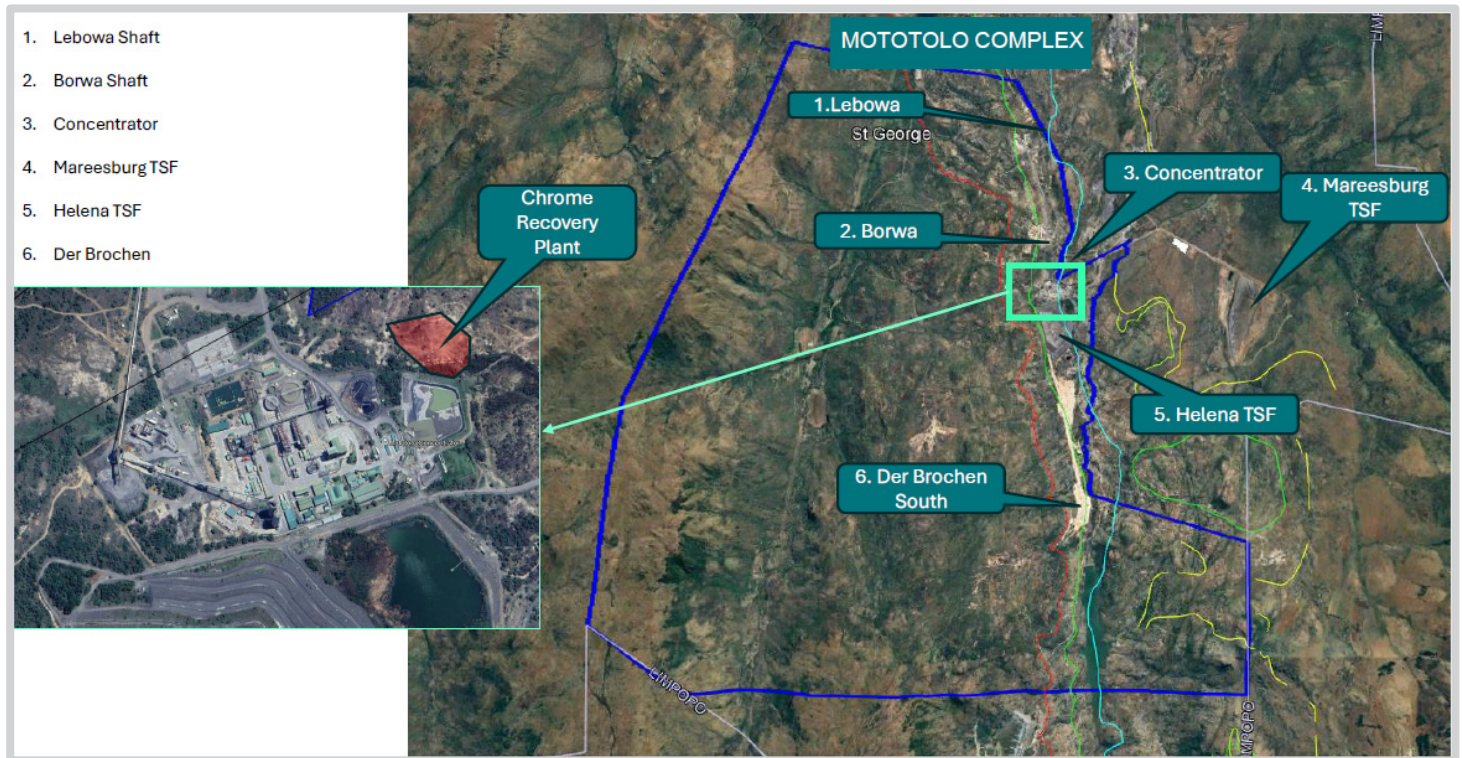


Figure 2: Mototolo Mine Complex operational areas

1.2 ENVIRONMENTAL AUTHORISATION BACKGROUND

A pre-feasibility environmental scan was conducted in August 2001 for the planned Der Brochen Mine. Seven environmental authorisations were submitted to the Department of Mineral and Petroleum Resources (DMPR) [known as the Department of Mineral Resources and Energy (DMRE) from 29 May 2019 - 28 August 2024 and as the Department of Mineral Resources (DMR) prior to May 2019], for various developments in the Groot and Klein Dwars River valleys, as part of the Der Brochen Mine development, between November 2002 and May 2010. The mineral right was converted to a new order mining right in terms of the Mineral and Petroleum Resources Development Act 28 of 2002 (MPRDA) in 2010 (MP 302 MR).

The DMPR issued a directive to RPM in May 2013, to align all previously approved Environmental Management Programmes (EMPrs) and consolidate them into a single document, since the commencement of the project in 2001. An Amendment to the Mining Work Programme (MWP) was submitted to the DMPR in 2014, which included an update to the Social and Labour Plan (SLP), as well as the March 2015 Consolidated Environmental Impact Assessment Report (EIAR) and EMPr. The 2015 EMPr also included new activities namely: two Open Pits (Northern and Southern Pits), re-routing of a 132 kV powerline, the raising of the existing Helena TSF, a Co-Disposal Facility (tailings disposal with a rock embankment in the north pit) and an expansion to the previously approved Maresburg TSF and associated infrastructure. The Final March 2015 EMPr was approved by the Limpopo Department of Economic Development, Environment & Tourism (LDEDET) on 10 June 2015, followed by DMPR approval on 21 September 2016.



RPM lodged a Section 102 Application to the DMPR on 2 November 2018, through the DMPR SAMRAD System (Ref: LP-00066-MR/102), in accordance with the MPRDA, to amend the Der Brochen Mining Rights area to include the farms and relevant farm portions associated with Mototolo Mine. In addition to the Section 102 Application, RPM also submitted an application to the DMPR to amend the existing Environmental Authorisation (EA) for the Der Brochen Project in accordance with Regulation 31 of the Environmental Impact Assessment (EIA) Regulations, promulgated under the National Environmental Management Act, Act 107 of 1998 (NEMA), to include the approved activities and farm portions applicable to the Mototolo Mine. The Der Brochen Amendment Project EIAR and EMPr was submitted to the DMPR in November 2019 and approved on 26 November 2021, and included the construction of a buttress wall at the existing Helena TSF, the additional filter press plant at the existing Mototolo Concentrator, and the additional mining related infrastructure such as the South decline shaft and associated infrastructure [*this EMPr and the Integrated Environmental Authorisation (IEA) are audited in a separate 2025 external compliance audit*].

Further development of the Mototolo Complex Mine Plan required an additional amendment, which served as an amendment of both the authorised Mototolo Mine EMPr and the 2015 Der Brochen EMPr, with the main purpose and benefits of combining the two approved EMPrs into a single document. The Der Brochen-Mototolo Mine Complex Amended EMPr was submitted in May 2021 and approved by the DMPR in the IEA dated 18/03/2022 (*this EMPr and IEA are audited in a separate 2025 external compliance audit*).

A Basic Assessment Report (BAR) was submitted to the DMPR in October 2022 (*Proposed Development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead line at Mototolo Mine, Limpopo Province - Final Basic Assessment Report, CES, October 2022*). The BAR covers the following infrastructure and activities associated with the Mototolo Mine's Borwa Decline Shaft, located on farms Richmond 370 KT and Thorncliffe 374 KT:

- » three ventilation shafts:
 - ~ Downcast South, approximately 2.2 km west of the main Borwa Shaft
 - ~ Upcast North, north-east of the Downcast Shaft, approximately 1.4 km west of the main Borwa Shaft
 - ~ Upcast South, south-east of the Downcast Shaft, approximately 2.1 km south-west of the main Borwa Shaft.
- » an emulsion borehole *en route* to the Downcast Shaft, approximately 1.5 km west of the main Borwa Shaft
- » six (6) borrow pits
- » access roads to each ventilation shaft
- » the construction of three new unshielded 11 kV pole mounted Fox overhead feeder lines (constructed to 33 kV specifications) with three 630 kVA 11 / 0.55 kV ONAN Dyn11 Type B minisub stations feeding Borwa
- » the establishment of a construction site camp within or near the project area.

An Addendum to the BAR was submitted by CES to the DMPR on 16 May 2023. The reason for the Addendum was explained in a letter attached as Appendix 7 of the Addendum, requesting the removal of GNR 983 Listing Notice 1, Activity 21 & 22 from the BAR submitted in October 2022. The letter motivated that Activity 21 would not be triggered as no mining activities will be undertaken at the borrow pits. The letter furthermore stated that Activity 22 would also not be triggered as no decommissioning of any activities is required.

The Final BAR was approved by the DMPR, with the EA issued on 2 June 2023.



2. LEGAL REQUIREMENTS AND SCOPE OF THE AUDIT REPORT

This audit report has been prepared in accordance with the NEMA EIA Regulations, 2014 (as amended)'s requirements for auditing (Regulation 34), with the contents being prepared in line with Appendix 7 of the Regulations, as detailed in **Sections 2.1** and **2.2**.

This annual environmental compliance audit covers the above 2022 BAR, 2023 Addendum and its associated 2023 EA - refer to **Section 2.3** below for a Project Description.

2.1 NEMA EIA REGULATIONS, 2014 (AS AMENDED): REGULATION 34

Regulation 34 of the NEMA EIA Regulations, 2014 (as amended): "Auditing of compliance with environmental authorisation, environmental management programme and closure plan", states:

- (1) The holder of an environmental authorisation must, for the period during which the environmental authorisation, EMPr, and the closure plan in the case of a closure activity, remain valid-
 - (a) ensure that the compliance with the conditions of the environmental authorisation, the EMPr, and the closure plan in the case of a closure activity, is audited; and
 - (b) submit an environmental audit report to the relevant competent authority.
- (2) The environmental audit report contemplated in subregulation (1) must-
 - (a) be prepared by an independent person with the relevant environmental auditing expertise; (**Section 3**)
 - (b) provide verifiable findings, in a structured and systematic manner, on- (**Sections 5** and **6**)
 - (i) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation, EMPr and the closure plan in the case of a closure activity; and
 - (ii) the ability of the measures contained in the EMPr and closure plan to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity;
 - (c) contain the information set out in Appendix 7; (**Section 2.2**) and
 - (d) be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation. (**Table 5**)
- (3) The environmental audit report contemplated in subregulation (1) must determine- (**Section 6.2**)
 - (a) the ability of the EMPr, and the closure plan in the case of a closure activity, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility;
 - (b) the level of compliance with the provisions of the environmental authorisation, EMPr or closure plan.
- (4) Where the findings of the environmental audit report contemplated in subregulation 1 indicate-
 - (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or
 - (b) insufficient levels of compliance with the environmental authorisation, EMPr or closure plan;the holder must, when submitting the environmental audit report to the competent authority in terms of subregulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report.
- (5) When submitting recommendations in terms of subregulation (4), such recommendations must have been subjected to a public participation process, which process has been agreed to by the competent authority and was appropriate to bring the proposed amendment of the EMPr or closure plan, to the attention of potential and registered interested and affected parties, including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the competent authority, for approval by the competent authority.



- (6) Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available-
 - (a) to anyone on request; and
 - (b) on a publicly accessible website, where the holder has such a website.
- (7) An environmental audit report must contain all information set out in Appendix 7 to these Regulations. (**Section 2.2**)

2.2 NEMA EIA REGULATIONS, 2014 (AS AMENDED): APPENDIX 7

Appendix 7 defines the content of the Environmental Audit Report, as below:

1 Environmental Audit Report

The environmental audit report must provide for recommendations regarding the need to amend the EMPr and the closure plan in the case of a closure activity.

2 Objective of the environmental audit report

The objective of the environmental audit report is to-

- (a) report on-
 - (i) the level of compliance with the conditions of the environmental authorisation and the EMPr and the closure plan in the case of a closure activity; and
 - (ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPr and closure plan achieve the objectives and outcomes of the EMPr and closure plan;
- (b) identify and assess any new impacts and risks as a result of undertaking the activity;
- (c) evaluate the effectiveness of the EMPr, and the closure plan in the case of a closure activity;
- (d) identify shortcomings in the EMPr, and the closure plan in the case of a closure activity; and
- (e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and the closure plan in the case of a closure activity.

3 Content of environmental audit reports

(1) An environmental audit report prepared in terms of these Regulations must contain-

- (a) details of the- (**Section 3**)
 - (i) independent person who prepared the environmental audit report; and
 - (ii) expertise of the 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; (**report sign-off page**)
- (c) an indication of the scope of, and the purpose for which, the environmental audit report was prepared; (**Section 2.3**)
- (d) a description of the methodology adopted in preparing the environmental audit report; (**Section 4**)
- (e) an indication of the ability of the EMPr, and the closure plan in the case of a closure activity to- (**Section 6.2**)
 - (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis;
 - (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility in the case of a closure activity; and
 - (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and the closure plan in the case of a closure activity;
- (f) a description of any assumptions made, and any uncertainties or gaps in knowledge; (**Section 6.2**)
- (g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report; (**Section 6.2**)
- (h) a summary and copies of any comments that were received during any consultation process; (**Section 6.2**) and
- (i) any other information requested by the competent authority. (**Section 6.2**)



2.3 SCOPE OF THE AUDIT REPORT

The layout of the proposed infrastructure authorised in the 2022 BAR, is depicted in **Figure 3**.

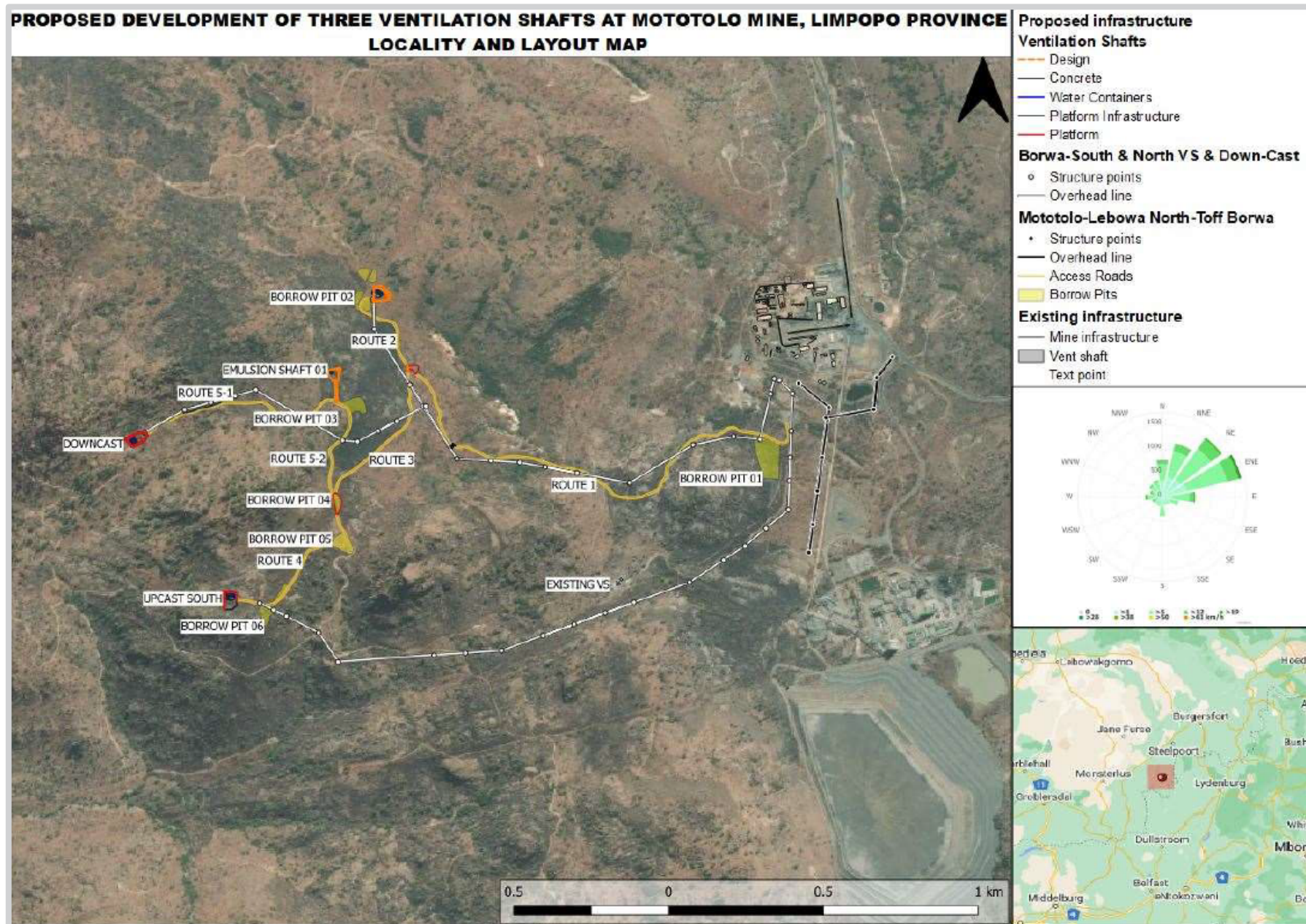
Figure 4 depicts the Final General Arrangement Drawing for the Borwa Ventilation Shafts and associated infrastructure, issued for Construction, with **Figure 5** depicting the final alignment of the overhead powerline for the project.

This audit is the first external compliance audit of the October 2022 BAR for the Proposed Development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead line at Mototolo Mine, as well as the 2023 EA in its entirety - *only the currently applicable sections of the BAR were audited, namely the construction of the Borwa Downcast South Ventilation Shaft and its associated access roads and borrow pits, which commenced on 24 May 2024:*

- » Table 3.19: Summary of impacts associated with the proposed Ventilation shafts during the planning and design phase:
 - ~ Environmental Policy
 - ~ Built Environment
 - ~ Socio-Economic
 - ~ Rehabilitation and Maintenance
 - ~ Terrestrial Biodiversity.
- » Table 3.20: Summary of impacts associated with the proposed Ventilation shafts during the construction phase:
 - ~ Environmental Policy
 - ~ Built Environment
 - ~ Socio-Economic
 - ~ Rehabilitation and Maintenance
 - ~ Terrestrial Biodiversity and Ecology Impacts
 - ~ Heritage Impacts
 - ~ River and Wetland Impact.

The following Sections of the BAR were not audited as none of the infrastructure/activities are operational, nor have any of the elements been decommissioned:

- » *Table 3.21: Summary of impacts associated with the proposed Ventilation shafts during the operational phase.*
- » *Table 3.22: Summary of impacts associated with the proposed Ventilation shafts during the decommissioning phase.*



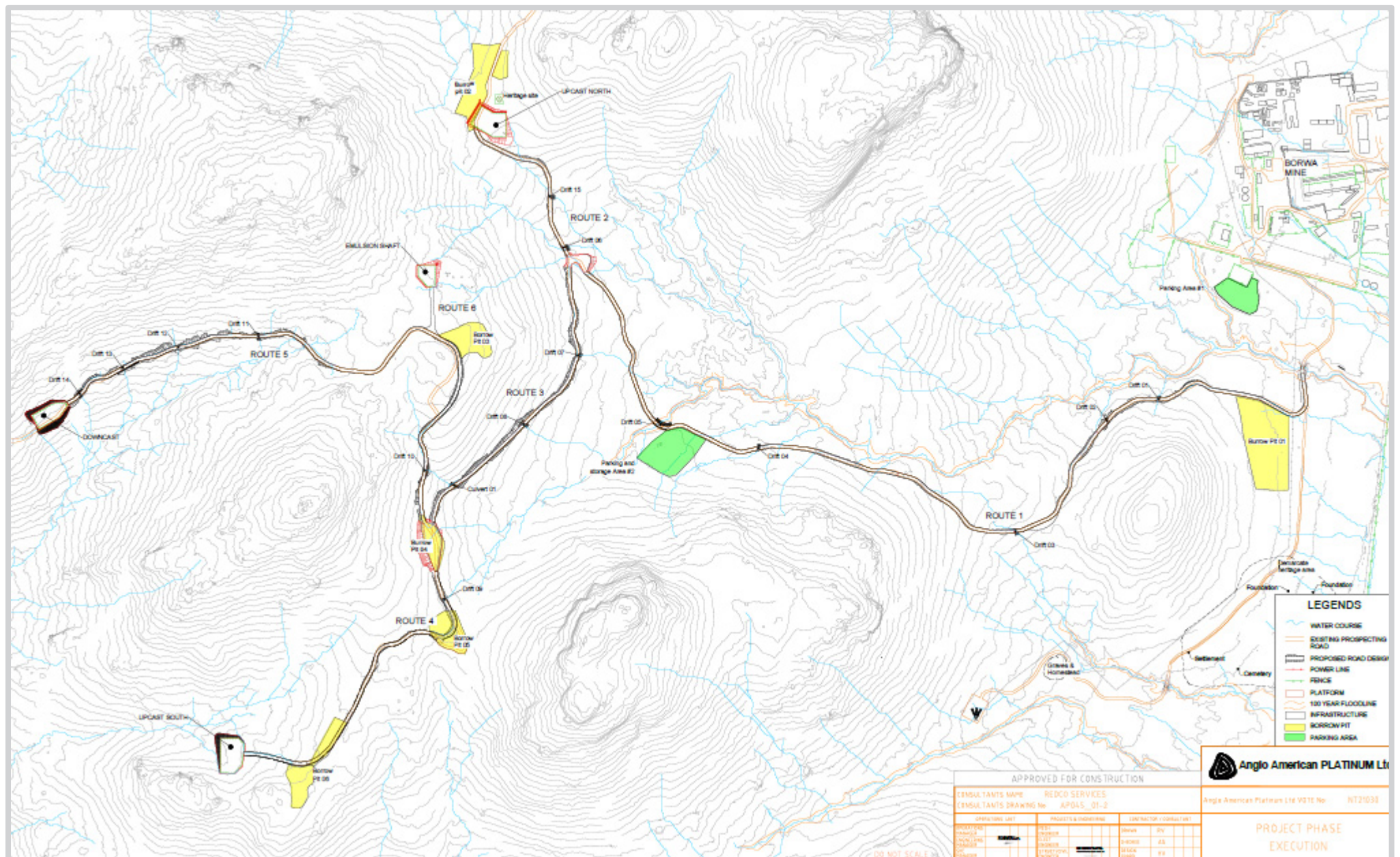


Figure 4: Mototolo Borwa Ventilation Shafts: General Arrangement (Redco, 27/05/24)



Figure 5: Mototolo Borwa Ventilation Shafts: Overhead Powerline Layout (N.T.S., 27/08/24)



3. DETAILS AND EXPERTISE OF THE INDEPENDENT PERSON THAT COMPILED THE ENVIRONMENTAL AUDIT REPORT

Jeannine Nienaber, Manager of J9 since January 2008, has over 26 and a half years' experience in the environmental management, energy management and permitting fields, consulting on Valterra (*previously AAP*) Projects since 2000. Jeannine obtained her Masters degree (*MSc*) in Environmental Management, *Cum Laude*, from the University of Johannesburg in 1998. She is an internationally certified EMP Compliance, EMS and ISO 14001 Lead Auditor and has been a Registered Professional Natural Scientist (*PrSciNat*) with the South African Council for Natural Scientific Professions (SACNASP), since 2003.

Jeannine's involvement at Mototolo and Der Brochen commenced in 2001, with her compiling the initial base case EMPR for the Der Brochen Mine, including all the subsequent Scoping Reports, EMPs and Amendments for the Trial Mining, Wellfields, Mototolo Helena TSF and various Der Brochen and Mototolo Projects, between 2001 and 2010. J9 was furthermore responsible for the Der Brochen Mine Richmond Trial Mining Phase and Mototolo Concentrator and Tailings Dam Environmental Performance Assessment Audit and Report. She also compile the Gap Analysis Report of the MPRDA and EMP Alignment, as part of the new order mining right conversion in 2010, followed by seven concept, pre-feasibility and feasibility environmental, sustainable development, energy and permitting reports for the various Der Brochen Projects between 2011 and 2022. J9 was appointed to compile the Mototolo Permitting Plan in 2022, as well as the Environmental Management and Permitting Investment Development Model (IDM) Study Reports for the Mototolo Off-River Pumped Hydro Storage (PHS) Concept Study between 2021 and 2022.

As stated above Jeannine became certified as an international EMP Compliance, EMS and ISO 14001 Lead Auditor, by the International Register of Certified Auditors (IRCA), in 2004. She has conducted over 180 compliance and Health, Safety, Environment and Community (HSEC) assurance audits in the mining industry for various clients over the last 26 and a half years, covering most of the RPM operational sites, including Der Brochen, Mototolo and Booyendal (both when the farm was still part of the Der Brochen mining right, as well as once it was sold to Northam Platinum Limited).

Jeannine also trained the top management at various Xstrata Plc' operations in conducting HSEC Assurance Audits. She has lastly been performing audit compliance inductions and training for many of RPM's Rustenburg Base Metals Refinery (RBMR)'s contractors since 2019 to present, and has been conducting the bi-weekly environmental compliance audits for the Copper Debottlenecking Project on site at BMR since 2019 (ongoing), emphasising her auditing capabilities and experience.

4. METHODOLOGY ADOPTED IN PREPARING THE ENVIRONMENTAL AUDIT REPORT

The Pre-Audit preparation included:

- » review of the 2022 BAR, 2023 Addendum and associated 2023 EA
- » an information request to the client to provide verification documents, evidence and proof of implementation of the BAR and EA conditions
- » compilation of audit checklists of all relevant conditions of the 2022 BAR and 2023 EA, to be audited on site.

An online Opening Meeting was held on Monday 23 June 2025. RPM was represented by the Environmental Team, Assurance Team and the Borwa Ventilation Shafts' Construction Team. The RPM Environmental Specialist presented a description of the areas to be audited (**Figure 2**), including existing infrastructure and activities.

J9 then proceeded to present:

- » auditor introductions



- » auditing schedule and plan (agreed with the schedule RPM presented)
- » audit reporting schedule
- » content of the audit (agreed with the contents RPM presented)
 - ~ it was agreed that the Audit Period was June 2024-June 2025
- » outstanding layout plans required for the site audit
- » the significance rating methodology (**Table 1**) and reporting of findings (2025 results and a comparison to the 2024 compliance ratings).

The audit of the Borwa Downcast South Ventilation Shaft and associated infrastructure was undertaken on 24 June 2025 by Jeannine Nienaber and Reneé Steele, as auditors and accompanied by:

- » Avhashoni Mashamba - Section Manager: Environmental (Mototolo Mine Complex)
- » Sharron Mkhabela - Environmental Specialist (Mototolo Mine Complex)
- » Lifa Mangane - Environmental Officer (Mototolo Mine)
- » Corne Boshoff - Construction Manager (Borwa Downcast South Ventilation Shaft).

Table 1: Audit Compliance Rating Methodology

2024 RATING	2025 RATING		DEFINITION
Compliant		Compliant	Condition/mitigation measure/commitment has been achieved, with evidence provided in the form of a document or site verification.
Non-Compliance		Non-Compliant	The failure to comply with, or fulfil, the requirements of an applicable condition, commitment and/or mitigation measure and/or no verification, nor evidence of compliance.
N/A		N/A	A condition, commitment and/or mitigation measure that is not applicable at the time of the audit, or not relevant to the operation/project/stage/type of construction/operation, or is an old commitment that was only applicable to a previously completed project/stage/type of construction/operation and cannot be implemented nor measured, and is thus not assessed, or where changes in RPM policies/procedures required implementation of alternative measures.
Take Note		Noted	The condition, commitment and/or mitigation measure that does not require any specific action or where no specific mitigation measures are provided for a condition.
Other (Corrected Finding, Observation)			

The post site audit clarifications, included the review of the site audit notes and photographic evidence, followed by an information request to the client for additional information and documents discussed on site. These documents were downloaded and reviewed. A draft report was compiled, including a photolog of evidence for the findings and to support the compliance ratings. The draft report was reviewed externally, prior to being submitted to the client for review. The final report was updated to include all the RPM environmental team and legal review comments and submitted electronically to the RPM Environmental Manager.

5. AUDIT FINDINGS

As stated in **Section 2.3**, the audit findings below relate only to the Borwa Downcast South Ventilation Shaft and its associated access roads (*route 1, 3 and 5*) and borrow pits (*1 and 3*), for which construction commenced on 24 May 2024. **Table 2** details the audit findings of the Oct 2022 Borwa Ventilation Shafts BAR, as audited on 24 June 2025, specifically for the Planning and Design Phase, as per the 2022 BAR Table 3.19. **Table 3** describes the compliance levels of the Construction Phase on site against the conditions in the 2022 BAR Table 3.20. **Table 4** lastly assesses the Borwa Ventilation Shaft Project's compliance against the EA issued for the 2022 BAR on 2 June 2023. **Annex 1** contains the Photolog of Evidence with photo numbering referenced in the tables below, as proof of the findings and clarification of the audit ratings.



Table 2: Borwa Ventilation Shafts, Emulsion Borehole and Overhead line - BAR (Oct, 2022) Compliance Audit Results - Planning Phase

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
TABLE 3.19: SUMMARY OF IMPACTS ASSOCIATED WITH THE PROPOSED VENTILATION SHAFTS DURING THE PLANNING AND DESIGN PHASE				
Environmental Policy				
Legal and policy compliance				
1	All relevant legislation and policy must be consulted and the proponent must ensure that the project is compliant with such legislation and policy.	- The BAR describes all the national, provincial and municipal environmental legislation applicable to the Borwa Ventilation Shafts and considered during compilation of the BAR. - The RPM Permitting Team ensured that all other applicable legislation was complied with during the planning and design phase of the Project.	Proposed Development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead line at Mototolo Mine, Limpopo Province - Final Basic Assessment Report, CES (Oct 2022)	
2	These should include (but are not restricted to): NEMA and Local Municipal bylaws.	- The BAR list the following legislation considered: - Constitution of the Republic of South Africa (Act 108 of 1996) - NEMA and the EIA Regulations, 2014 - NEM: Biodiversity Act (NEM:BA), (Act 10 of 2004) - Alien and Invasive Species Regulations, 2014, as amended on 25 September 2020 - NEM: Air Quality Act (NEM:AQA), (Act 39 of 2004) with subsequent amendments and Regulations - National Heritage Resources Act (NHRA), (Act 25 of 1999) - National Water Act (NWA), (Act 36 of 1998) - National Forests Act (NFA), (Act 84 of 1998) and its subsequent amendments, as well as the latest List of Protected Tree Species, in Government Gazette No. 40521 of 23 December 2016 - NEM: Protected Areas Amendment Act (NEM:PAA), (Act 31 of 2004) - NEM: Waste Act (NEM:WA), (Act 59 of 2008) and its subsequent amendments - Occupational Health and Safety Act (OHSA), (Act 85 of 1993) - Noise Regulations under the Environment Conservation Act (ECA), (Act 73 of 1989) and the South African National Standards (SANS) - The Hazardous Substances Act (HSA), (Act 15 of 1973) - Conservation of Agricultural Resources Act, (Act 43 of 1983) - Sekhukhune District Municipality Integrated Development Plan (2021/2022)		



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
3	All relevant permits and authorisations including Water Use Licences or General Authorisations, Building Plan Approvals and plant removal permits must be in place prior to commencement of construction.	- The RPM Environmental and Permitting Teams ensured that all authorisations, licences and permits were obtained prior to construction commencing, including: - EA for the Borwa Ventilation Shafts BAR - Registration of Water Use in terms of General Authorisation (GA) for Section 21 (c) and/or (i) of the NWA as gazetted in General Notice (GN) 509 dated 26 Aug 2016 - Protected trees permit for the farms Richmond 370 KT and Thorncliffe 374 KT - Protected plants permit for Richmond 370 KT and Thorncliffe 374 KT.	- Environmental Authorisation in terms of NEMA and the EIA Regulations, 2014 for mining associated with infrastructural activities within the Sekhukhune District Municipality: Limpopo Region, DMRE (02/06/23) - Registration of Water Use in terms of Section 39 of the NWA, No 36 of 1998 for Anglo American Platinum Limited: Proposed development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead Line in Quaternary Catchment B41G-Olifants, Mpumalanga DWS (03/04/23) - Licence LP-SDM-0216-223-24: 04 Mar 2024 to 04 Mar 2025: to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of Section 15(1) of the National Forests Act, 1998, Department of Forestry, Fisheries & the Environment (DFFE) (04/03/2024) - Wildlife Trade and Regulation Permit to pick protected plants on Richmond 370 KT & Thorncliffe 374 KT, LDEDET (11/06/24)	
Built Environment Infrastructure				
4	Planning for and placement of infrastructure must be done so as to avoid sensitive areas as far as possible.	- The Borwa Downcast South Ventilation Shaft, Borrow Pit 3, access routes 3 and 5, and part of route 1, are located in near-natural Sekhukhune Mountain Bushveld (SMB) vegetation, rated as having a high sensitivity. Borrow Pit 1 and part of access route 1 are located in the semi-natural SMB, which was assigned a moderate sensitivity. - Condition 20 of the BAR (Table 2) however states that: <i>'The proposed layout of ventilation and emulsion borehole precludes the avoidance / prevention of impacts within high SEI terrestrial areas, because the locations of these shafts are contingent on the operational requirements of the underground mining activities.'</i> - Route 1 is 55 m away from both the identified Historical Period settlement areas (Site EXIGO-TC374-HP01 and Site EXIGO-TC374-HP02). - Signs were observed during the audit at the sites stating: <i>'Heritage sensitive area. Do not enter.'</i>	- Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022) - Der Brochen-Mototolo Mine Complex - Amended EMP: Figure 7-9 (Heritage Sites located within the original Mototolo Mine area, Exigo, 2014), SRK (May, 2021) - Photos 2-3 - warning signs to avoid sensitive heritage sites	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Stormwater management				
5	A method statement must be developed by the project manager or contractor prior to construction, including considerations for stormwater, erosion, waste and alien vegetation management, as well as site rehabilitation and maintenance considerations. This method statement must be approved by the appointed ECO.	- Turnkey Civil International (TCI) developed a method statement for the construction of access roads 1, 3 and 5 to the downcast ventilation shaft and downcast platform, as well as borrow pits 1, 3 and 4, describing: - topsoil stripping - gabion structures and reno mattresses at the drift crossings and culvert crossings - reshaping, rehabilitation and re-vegetation of the borrow pit areas and access route - environmental matters: drip trays, refuelling, waste management, dust suppression, hazardous substances and spill response. - The method statement was developed in Mar 2024 prior to construction commencing in May 2024. - The method statement does not address alien vegetation management.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
6	This method statement should include stormwater management considerations to control runoff prevent erosion of the site and its surroundings, and mitigate the unnecessary loss of soil and sedimentation of watercourses during all phases of the project.	The TCI method statement includes the various stormwater management structures for the ventilation shafts and roads, and refers to the Redco design drawings, depicting the details of the runoff and erosion control measures.		
7	Regular monitoring of implementation of this method statement for the rehabilitation of disturbed areas must be conducted.	- The TCI method statement lists monitoring requirements as the responsibility of the Project Manager (monitoring progress), Site Manager (QCA monitoring) and Construction Supervisor (monitoring construction processes). - The method statement includes stripping and stockpiling of topsoil for rehabilitation, with the Construction Environmental Officer responsible for all environmental-related monitoring. - The Environmental Officer conducts monthly internal compliance audits of the construction project against the conditions of the EA.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Jan-May 2025 and Aug-Dec 2024)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
8	Appropriate stormwater structures, in alignment with the method statement, must be designed to minimise erosion of the surrounding environment to the extent required.	The Redco designs of the stormwater management along the access roads, show various v-drains to divert water to the surrounding environment, stormwater management and erosion control structures at the drifts and culverts, and lined dams at the Borwa Downcast South Ventilation Shaft terrace.	- Mototolo Borwa Ventilation Shaft: Roads & Drainage: Route 1: General Arrangement and Details, Redco (09/09/24) - Mototolo Borwa Ventilation Shaft: Roads & Drainage: Route 1: Drift 1 to Drift 4 Sections and Details, Redco (27/05/24) - Mototolo Borwa Ventilation Shaft: Roads & Drainage: Downcast Vent Shaft Platforms: Downcast Sections and Gabion Details, Redco (27/05/24)	
Waste management				
9	A method statement must be developed by the project manager or contractor prior to construction, including considerations for stormwater, erosion, waste and alien vegetation management, as well as site rehabilitation and maintenance considerations. This method statement must be approved by the appointed ECO.	- TCI developed a method statement for the construction of access roads 1, 3 and 5 to the downcast ventilation shaft and downcast platform, as well as borrow pits 1, 3 and 4, describing: - topsoil stripping - gabion structures and reno mattresses at the drift crossings and culvert crossings - reshaping, rehabilitation and re-vegetation of the borrow pit areas and access route - environmental matters: drip trays, refuelling, waste management, dust suppression, hazardous substances and spill response. - The method statement was developed in Mar 2024 prior to construction commencing in May 2024. - The method statement does not address alien vegetation management.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
10	This method statement should include waste management considerations for handling onsite general and hazardous waste during the construction and operation phases must be developed and implemented during construction.	- The TCI method statement addresses waste management, waste reduction, waste collection and disposal, stating that: <i>'Waste generated during construction (hazardous, domestic, and concrete spoil) will be handled as detailed in Waste Management procedure.'</i> - Waste at Mototolo Mine Complex is managed in line with the Waste Management Procedure.	Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012)	
11	An appropriate area must be identified where waste can be stored before disposal.	A bundled waste management station with domestic waste separation bins is located at Borrow Pit 1.	Photo 43 - waste management station	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
12	All hazardous substances such as paints, diesel and cement must be stored in a secure bunded area with an impermeable surface beneath them.	- All required hazardous substances are stored in a chemical storage cage in a concrete bunded area at the TCI Site Office. - Equipment filled with diesel are stored in a separate concrete bunded area. - Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure.	- Photo 5 - chemical cage in concrete bunded area - Photo 6 - concrete bunded area for equipment storage - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure , TCI (TCI/SOP/ENV/011)	
Socio-Economic				
Job creation				
13	N/A	-	-	
Health and safety				
14	A health and safety plan in terms of the Occupational Health and Safety Act, 1993 (Act No 85 of 1993) must be drawn up by and HSE officer prior to construction to ensure workers safety.	- The Mototolo Mine Complex SHEQ Management Plan addresses the health and safety of all employees. - TCI compiled a Health & Safety Management Plan in line with the: - Occupational Health & Safety Act, Act 85 of 1993 - Occupational Health & Safety Amendment Act, Act 181 of 1993 - Construction Regulations 2014.	- Mototolo Complex SHEQ Management Plan (MOTC-SHE-SHE-PLAN-0002) - Safe Operating Procedure: Health & Safety Management Plan, TCI (TCG/SOP/SHE/008)	
On-site fire risk				
15	Emergency preparedness must be in place for both the construction and operational phases and before these phases commence. This should form part of the method statement.	- The TCI method statement addresses emergencies as follows: <u>Construction Safety Officer</u>. Trains and carries out drills and exercises on how to manage emergency situations. Performs emergency response drills. <u>Signs & Barricading</u>. It shall be ensured that safety signs are erected to warn workers and visitors of specific hazards and to communicate necessary precautionary measures and emergency actions. Barricading controls shall also be implemented and authorised as part of the incident management and emergency response procedures. - The Mototolo Mine Complex Emergency Response Plan addresses a variety of emergency preparedness measures and emergency response measures on site.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Emergency Response Plan (MOTC-SHE-EME-MAN-0001)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
16	Anglo American Platinum must plan for and put measures in place to prevent and deal with fires including the provision of firefighting equipment.	- The aim of the Mototolo Mine Complex veldfire procedure is to implement veldfire management plans in order to comply with the National Veld and Forest Act No. 101 of 1998, and deals with: 'protection from veld fire, veld fire prevention, veld fire awareness and veld fire preparedness. - Fire extinguishers were available at the Borwa Downcast South Ventilation Shaft construction site, with the access gate sign also addressing fires stating: - No open flames on site. - No smoking in any enclosed area. - Smoking in designated areas only.'	- Mototolo Complex Procedure to prevent veldfires (MOTC-SHE-ENV-PRO-0005) - Photo 7 - fire extinguishers at the Borwa Downcast South Ventilation Shaft construction site - Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign	
17	Consultation with the local Road Traffic Unit should be done early in the planning phase and if deemed necessary, road traffic permits should be obtained for transporting parts, containers, materials and construction equipment to the site to the extent required.	Permits were obtained from the Mpumalanga Transport Regulation Department for the excavators to be transported to site.	- Exemption Permit Issued in terms of Section 81 of the National Road Traffic Act (Act No. 93 of 1996), Dept of Community Safety, Security and Liaison: Section Abnormal Loads (17/10/24) - Exemption Permit Issued in terms of Section 81 of the National Road Traffic Act (Act No. 93 of 1996), Dept of Community Safety, Security and Liaison: Section Abnormal Loads (23/07/24)	
18	Make provision for traffic accommodation where construction activities impact on existing roads.	A Traffic Management Plan (TMP) was developed for the construction of the Borwa Ventilation Shafts, and the surface layout plan includes traffic signs and traffic rules for existing Borwa Shaft and vent shaft roads, as well as the new access roads to the various infrastructure and activities.	Mototolo Complex Borwa Vent Shaft: Surface Traffic Management Plan, Valterra (04/08/25)	
Rehabilitation and Maintenance				
Inadequate rehabilitation and maintenance				
19	A rehabilitation plan must be developed by the project manager or contractor as part of the method statement and implemented during construction and operation phases. This method statement must be approved by the appointed ECO.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Terrestrial Biodiversity				
<i>The planned layout and siting of construction activities and infrastructure will directly result in the destruction and permanent loss of 5.93 ha of SMB vegetation and faunal habitat during the construction phase. The consequence and significance of this impact depends on the pre-construction SEI of the vegetation and habitat.</i>				
	Avoid/prevent impact:			
20	The proposed layout of ventilation and emulsion borehole precludes the avoidance / prevention of impacts within high SEI terrestrial areas, because the locations of these shafts are contingent on the operational requirements of the underground mining activities. Please refer to offset mitigation below.	This condition is noted by RPM.	Audit information review and post site audit clarifications	
21	The siting and layout of supporting infrastructure (e.g. access roads and powerlines) must follow existing disturbed corridors (i.e. existing access roads and servitudes) as far as possible to avoid further impact. Please also refer to minimization and rehabilitation mitigation below.	- It is clear from the final construction layout plan (Figure 4) that the proposed access roads almost exactly follow the existing prospecting roads. - The BAR shows that the proposed powerline also generally follows the access road (Figure 3), within the limitations of straight lines, but the Environmental Officer's May 2025 internal compliance audit states that the initial powerline plan in the BAR has not been followed and was rerouted. - The construction drawing for the 2024 powerline route (Figure 5) shows that it has been realigned to more closely follow the proposed access roads/existing prospecting roads.	- Mototolo Borwa Ventilation Shaft: Roads & Drainage: Site overview design: General Arrangement, Redco (27/05/24) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (May 2025) - Mototolo APC Borwa Shaft: General & Site Development - Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
22	It is recommended that the location of borrow pit 02 be moved to a semi-natural or already-degraded area. This will prevent the loss of 2 138 m² of natural to near-natural SMB vegetation and habitat. If this is not feasible, the below measures must be implemented to minimize impacts and rehabilitate the area.	- The 2022 BAR shows Borrow Pit 2 located in the highly sensitive near-natural SMB vegetation. The final construction layout plan (Figure 4) depicts Borrow Pit 2 in the same location as in the 2022 BAR (<i>though not constructed yet</i>). - None of the below recommended 'minimise', 'remediate' or 'offset' conditions were complied with.	- Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022) - Mototolo Borwa Ventilation Shaft: Roads & Drainage - Site overview design - General Arrangement, Redco (27/05/24)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
	Minimize/reduce impact:			
23	During the planning and design phase, the development footprint must be designed to minimize the loss of natural to semi-natural indigenous vegetation as far as possible.	- The access roads (Figure 4) and realigned powerline (Figure 5) were designed along the existing prospecting roads. - The Borwa Downcast South Ventilation Shaft, Borrow Pit 3, access routes 3 and 5, and part of route 1, are located in near-natural Sekhukhune Mountain Bushveld (SMB) vegetation, rated as having a high sensitivity. Borrow Pit 1 and part of access route 1 are located in the semi-natural SMB, which was assigned a moderate sensitivity. - Condition 20 of the BAR (Table 2) however states that: <i>'The proposed layout of ventilation and emulsion borehole precludes the avoidance / prevention of impacts within high SEI terrestrial areas, because the locations of these shafts are contingent on the operational requirements of the underground mining activities.'</i>	- Mototolo Borwa Ventilation Shaft: Roads & Drainage - Site overview design - General Arrangement, Redco (27/05/24) - Mototolo APC Borwa Shaft: General & Site Development – Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24) - Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022)	
24	The development footprint must be clearly demarcated by a qualified ECO prior to the commencement of construction. Only vegetation within the approved footprint may be removed. Vegetation outside of these areas may not be cleared.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A stay-in-business (SIB) project is currently underway to rehabilitate this area.	- Site audit observations and interviews (24/06/25) - Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated	
25	Footprint creep must not occur.	- The Environmental Officer monitors footprint creep. - As stated above, borrow material was however collected outside of the demarcated footprint.	Site audit observations and interviews (24/06/25)	
	Remediate/rehabilitate impact:			
26	A rehabilitation plan must be developed by the project manager or contractor as part of the method statement and implemented during construction and operation phases. This method statement must be approved by the appointed ECO.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
	Offset impact:			
27	• A biodiversity offset plan must be compiled by an ecologist with experience in undertaking and facilitating offsets in consultation with key stakeholders.	• No biodiversity offset plan has been developed.	• Audit information review and post site audit clarifications	
28	• The objective of the offset must be to rehabilitate the vegetation and habitat of an existing disturbed area that would compensate for the calculated 2.60 ha loss.			
Non-compliance with permitting requirements				
	Avoid/prevent impact:			
29	• Planning for any search and rescue operations must be conducted prior to the commencement of construction activities.	• The Agreenco Technical Note describes the surveys undertaken from 10-12 Oct 2023 along the footprints of the proposed ventilation shafts, access roads, powerlines and borrow pits. It details the threatened or protected species (TOPS) identified. • This was done during the planning phase, as construction commenced on 24/05/24. • Due to the 2024 realignment of the powerline route (Figure 5), the initial section of the powerline from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, was not surveyed by Agreenco.	• Technical Note: Assessment of protected plant species in areas earmarked for the development of ventilation shafts and associated infrastructure at the Anglo American Platinum, Mototolo Complex's Borwa Shaft, Agreenco (02/11/23) • Mototolo APC Borwa Shaft: General & Site Development - Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
30	• All necessary permits must be obtained for the removal of any identified SCC prior to the commencement of construction activities.	• The RPM Environmental and Permitting Teams ensured that all authorisations, licences and permits were obtained prior to construction commencing, including: o Protected trees permit for the farms Richmond 370 KT and Thorncliffe 374 KT o Protected plants permit for Richmond 370 KT and Thorncliffe 374 KT.	• Licence LP-SDM-0216-223-24: 04 Mar 2024 to 04 Mar 2025: to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of Section 15(1) of the National Forests Act, 1998, DFFE (04/03/2024) • Wildlife Trade and Regulation Permit to pick protected plants on Richmond 370 KT & Thorncliffe 374 KT, LDEDET (11/06/24)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Disruption of Ecosystem Function and Processes				
	Minimize/reduce impact:			
31	During the planning and design phase, the development footprint must be designed to minimize edge disturbance impacts.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - The Environmental Officer monitors footprint creep. - Route 1 is 55 m away from both the identified Historical Period settlement areas (Site EXIGO-TC374-HP01 and Site EXIGO-TC374-HP02). - Warning signs were also placed along the access roads closest to the two identified cultural heritage sites, restricting access.	- Site audit observations and interviews (24/06/25) - Der Brochen-Mototolo Mine Complex - Amended EMP: Figure 7-9 (Heritage Sites located within the original Mototolo Mine area, Exigo, 2014), SRK (May, 2021) - Photos 2-3 - warning signs to avoid sensitive heritage sites	
	Remediate/rehabilitate impact:			
32	A rehabilitation plan must be developed by the project manager or contractor as part of the method statement and implemented during construction and operation phases. This method statement must be approved by the appointed ECO.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	
Establishment and/or spread of Alien Plant Species				
	Minimize/reduce impact:			
33	An Alien Vegetation Management Plan must be developed by the Contractor prior to construction to mitigate the establishment and spread of undesirable alien plant species during all phases of the project.	- The TCI method statement does not address alien vegetation management, and the Environmental Officer confirmed no invasive alien plants (IAP) have been removed at the construction site. - Mototolo Mine Complex has an Invasive and Alien Vegetation Procedure, which describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009)	
34	The Alien Vegetation Management Plan must be approved by the appointed ECO prior to implementation.			



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
	Remediate/rehabilitate impact:			
35	• A rehabilitation plan must be developed by the project manager or contractor as part of the method statement and implemented during construction and operation phases. This method statement must be approved by the appointed ECO.	• The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. • A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreeco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	• Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) • Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreeco (07/01/25)	



Table 3: Borwa Ventilation Shafts, Emulsion Borehole and Overhead line - BAR (Oct, 2022) Compliance Audit Results - Construction Phase

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
TABLE 3.20: SUMMARY OF IMPACTS ASSOCIATED WITH THE PROPOSED VENTILATION SHAFTS DURING THE CONSTRUCTION PHASE				
Environmental Policy				
Legal and policy compliance				
36	All construction related conditions in the Environmental Authorisation, EMPr and other permits must be adhered to.	The BAR and EA conditions were shared with the TCI contractors on site during a Project Meeting in Oct 2024, with the Attendance Register attached to the Environmental Officer's Nov 2024 Internal Compliance Audit.	- Borwa Vent Shaft Project Meeting Attendance Register (08/10/24) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Nov 2024)	
37	Anglo American Platinum must employ an independent Environmental Control Officer (ECO) for the construction phase to ensure that construction is implemented according to specifications in the EA and EMPr.	- RPM notified the DMPR of the appointment of the ECO for the Borwa Ventilation Shafts on 18 July 2024. - The ECO is however a permanent RPM employee and not an independent ECO.	Notification and Provision of Information to the Department (SHE/2024/563), RPM (18/07/24)	
38	Copies of all applicable licenses, permits and managements plans (EA, EMPr, etc.) must be available on-site at all times.	Electronic copies of the 2022 BAR and associated 2023 EA are available on site.	Site audit interviews (24/06/25)	
39	Environmental Awareness Training must be included in site meetings/talks with all workers.	- Proof of monthly environmental awareness topics was supplied to the auditor. - The employees and contractors all attended the standard Mototolo Mine Complex environmental inductions, as well as the additional Cultural Heritage induction.	- Mototolo Mine Environmental Talk Topic: Environmental Best Practices (Jan 2025) - Mototolo Complex Environmental Talk Topic: The importance of Wetlands (Feb 2025) - Mototolo Complex Environmental Talk Topic: Addressing water scarcity and pollution (Mar 2025) - Mototolo Complex Cultural Heritage Employee and contractor induction	
Built Environment				
Infrastructure				
40	Vegetation clearance must be limited to the area within the footprint of the designated area.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area.	- Site audit observations and interviews (24/06/25) - Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated	
41	Vegetation disturbance outside of the development footprint should be minimized.	- The Environmental Officer monitors footprint creep. - As stated above, borrow material was however collected outside of the demarcated footprint.	Site audit observations and interviews (24/06/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Material stockpiling				
42	• Material stockpiles must be located away from sensitive areas and they must be monitored for erosion and alien vegetation.	• The stripped topsoil is stockpiled at Borrow Pits 1 and 3. • Aggregate, for use in construction, is also stockpiled at Borrow Pit 1. • Borrow Pit 3 is located in near-natural SMB vegetation, rated as having a high sensitivity, with Borrow Pit 1 located in the semi-natural SMB, which was assigned a moderate sensitivity. • The stockpiles are monitored by the Environmental Officer, but some erosion gullies and IAP were observed on the stockpiles at Borrow Pit 1.	• Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022) • Site audit observations and interviews (24/06/25) • Photo 9 - Borrow Pit 1: topsoil stockpiles • Photo 10 - Borrow Pit 1: erosion gullies along the topsoil stockpiles • Photo 11 - Borrow Pit 1: aggregate stockpiles • Photo 12 - Borrow Pit 3: topsoil stockpiles	
43	• Material stockpile locations must be approved by the ECO.	• The stockpiles' locations were approved by the Environmental Officer and Construction Manager in/ adjacent to disturbed areas and close to areas requiring rehabilitation.	• Site audit observations and interviews (24/06/25)	
Stormwater management				
44	• The construction site must be managed in a manner that prevents pollution to downstream watercourses or groundwater, due to suspended solids, silt or chemical pollutants.	• All hazardous substances are stored in chemical cages, on a concrete surface with bund walls, at the TCI Site Office. • The TCI method statement describes the gabions, geotextile and reno mattresses installed/being installed at each of the drifts and culvert crossings where the access roads cross the drainage lines, to prevent erosion and capture runoff sediment. • The method statement also states that v-drains are cut through windrows at the road edges, to divert water to the surrounding environment.	• Site audit observations and interviews (24/06/25) • Photo 5 - chemical cage in concrete bund area • Photo 6 - concrete bund area for equipment storage • Photo 13 - gabions, geotextile and reno mattresses at Drift 1 • Photo 14 - gabions, geotextile and reno mattresses at Drift 5 • Photos 15-16 - gabions upgradient and downgradient of the downcast vent shaft terrace	
45	• Berms and swathes must be placed in areas that may be prone to erosion.	• In addition to the erosion management measures described in Condition 44 above, berms have been constructed at the topsoil stockpiles and a cut-off berm along access route 1.	• Photo 17 - cut-off berm along access route 1 • Photo 18 - berms at the Borrow Pit 1 topsoil stockpiles	
46	• Temporary cut-off drains and berms may be required to capture storm water and promote infiltration.			
Waste management				
47	• All general waste must be disposed of in bins/waste skips labelled "general waste".	• Domestic waste is separated at source at Mototolo Mine Complex, in line with their Waste Management Procedure. • A bunded waste management station with the different domestic waste separation bins is located at Borrow Pit 1.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 4 - waste management station	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
48	Sufficient waste bins must be provided throughout the construction site for collecting waste.	A bunded waste management station with the different domestic waste separation bins is located at Borrow Pit 1.	Photo 4 - waste management station	
49	All general waste collected on site must be disposed of at a licensed general waste disposal site.	- The waste bins are removed off-site to the Borwa salvage yard for sorting and disposal. - Waste Legends' (<i>Mototolo Mine Complex external waste contractor</i>) monthly waste recon shows separate disposal of domestic and hazardous waste at the applicable licenced facilities.	- Post site audit clarifications - Waste Recon: Mototolo - Borwa, Waste Legends, 2025	
50	All hazardous waste generated on site must be placed in a temporary impermeable bunded containment area which must be disposed of at a hazardous landfill site or be collected by the appropriate service provider.	- No hazardous waste bins or skips nor a containment area were observed at the construction site. - The TCI method statement addresses waste management, waste reduction, waste collection and disposal, stating that: '<i>Waste generated during construction (hazardous, domestic, and concrete spoil) will be handled as detailed in Waste Management procedure.</i>' - Waste at Mototolo Mine Complex is managed in line with the Waste Management Procedure. - Waste Legends' (<i>Mototolo Mine Complex external waste contractor</i>) monthly waste recon shows separate disposal of domestic and hazardous waste at the applicable licenced facilities.	- Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) - Waste Recon: Mototolo - Borwa, Waste Legends, 2025	
51	Proof of receipt of hazardous waste by a licenced service provider must be maintained on the site.	Waste Legends' (<i>Mototolo Mine Complex external waste contractor</i>) monthly waste recon shows separate disposal of domestic and hazardous waste at the applicable licenced facilities.	- Post site audit clarifications - Waste Recon: Mototolo - Borwa, Waste Legends, 2025	
52	Adequate sanitary facilities must be provided for construction workers and they must be properly secured to the ground.	Chemical toilets are provided site-wide.	Photo 19 - chemical toilets on site	
53	Maintenance of the chemical toilets should be done on a regular basis to prevent any leakages.	The toilets are maintained and managed by an external contractor.	Site audit observations and interviews (24/06/25)	
54	Concrete and cement must take place on an impermeable surface, and dried waste concrete and cement must be disposed of with building rubble.	- Trucks deliver premixed concrete to site. - No mixing of concrete/cement takes place on site. - No evidence of concrete/cement waste was observed on site.	Post site audit clarifications	
55	No concrete mixing must take place within 32 m of any watercourse.		Post site audit clarifications	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Socio-Economic				
Job creation				
56	• N/A	-	-	N/A
Health and safety				
57	• A health and safety plan in terms of the Occupational Health and Safety Act, 1993 (Act No 85 of 1993) must be adhered to and enforced by a HSE officer to ensure workers safety.	• The Mototolo Mine Complex SHEQ Management Plan addresses the health and safety of all employees. • TCI compiled a Health & Safety Management Plan in line with the: ◦ Occupational Health & Safety Act, Act 85 of 1993 ◦ Occupational Health & Safety Amendment Act, Act 181 of 1993 ◦ Construction Regulations 2014.	• Mototolo Complex SHEQ Management Plan (MOTC-SHE-SHE-PLAN-0002) • Safe Operating Procedure: Health & Safety Management Plan, TCI (TCG/SOP/SHE/008)	
Air quality and dust control				
58	• During windy periods un-surfaced and un-vegetated areas must be dampened down.	• The TCI method statement states: ◦ 'Dust suppression shall be performed with the available water trucks on site. Haul roads shall be kept dust free at all times. ◦ Dust suppression and control will be implemented as outlined in the dust control procedure.' • No dust plumes were observed on site during the audit.	• Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) • Site audit observations and interviews (24/06/25)	
59	• Vegetation must be retained where possible as this will reduce dust travel.	• Site observations confirmed that vegetation was only cleared from the minimum areas required for the construction areas, with all surrounding natural vegetation intact.	• Site audit observations and interviews (24/06/25)	
60	• Any complaints or claims emanating from dust issues must be attended to immediately and noted in the complaints register.	• A complaint register is kept on site, though no complaints have been received to date.	• Construction Complaint Register (2024-2025)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
61	Vehicles and construction plant must be serviced regularly so as to reduce excessive vehicle emissions.	- The TCI method statement states the following for Plant & Equipment: <i>Prior to arriving on site all earthworks equipment will have a documented premobilization inspection.</i> <i>All earthwork equipment will have daily, documented pre-start inspections, as per relevant company procedure.</i> <i>Machinery and equipment will be inspected at least monthly and maintained in a safe condition.</i> <i>Perform maintenance as per the relevant OEM specifications.</i>	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
On-site fire risk				
	In order to reduce the risk of fires:			
62	All flammable substances must be stored in dry areas which do not pose an ignition risk to the said substances.	- All required hazardous substances are stored in a chemical storage cage in a concrete bunded area at the TCI Site Office. - Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure.	- Photo 5 - chemical cage in concrete bunded area - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure , TCI (TCI/SOP/ENV/011)	
63	Smoking must not be permitted near flammable substances.	- The access gate sign at the Borwa Downcast South Ventilation Shaft construction site states: <i>No open flames on site.</i> <i>No smoking in any enclosed area.</i> <i>Smoking in designated areas only.</i>	Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign	
64	All cooking must be done in demarcated areas that are safe in terms of runaway or uncontrolled fires.	No cooking is undertaken on site.	Site audit observations and interviews (24/06/25)	
65	No open fires must be allowed on site.	- The aim of the Mototolo Mine Complex veldfire procedure is to implement veldfire management plans in order to comply with the National Veld and Forest Fire Act (Act 101 of 1998), and deals with: <i>protection from veld fire, veld fire prevention, veld fire awareness and veld fire preparedness.</i> - The access gate sign at the Borwa Downcast South Ventilation Shaft construction site states: <i>No open flames on site.</i> <i>No smoking in any enclosed area.</i> <i>Smoking in designated areas only.</i>	- Mototolo Complex Procedure to prevent veldfires (MOTC-SHE-ENV-PRO-0005) - Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
66	Fire extinguishers must be available onsite.	Fire extinguishers were available at the Borwa Downcast South Ventilation Shaft construction site.	Photo 7 - fire extinguishers at the Borwa Downcast South Ventilation Shaft construction site	
Rehabilitation and Maintenance				
Inadequate rehabilitation and maintenance				
67	The rehabilitation plan must be implemented during and after the construction has been completed.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	
Terrestrial Biodiversity and Ecology Impacts				
Loss of 5.93 ha of SMB vegetation for the construction / establishment of the ventilation shafts, emulsion borehole, borrow pits, pylons and access roads. The consequence and significance of this impact depends on the preconstruction SEI of the vegetation.				
	Minimize/reduce impact:			
68	Construction activities must remain within the approved demarcated development footprint, and no vegetation clearance is to be permitted outside of the approved development footprint.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area. - The Environmental Officer monitors footprint creep.	- Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated - Site audit observations and interviews (24/06/25)	
69	Construction vehicles and machinery must not encroach into identified highly-sensitive, 'no-go' areas or areas outside the project footprint.	- The TCI Method statement states: 'All vehicles and equipment shall only move on the designated haul roads as agreed with the Engineer.' 'No vehicles, plant or equipment shall be allowed to deviate from the existing haul roads.' - A TMP was developed for the construction of the Borwa Ventilation Shafts, and the surface layout plan includes traffic signs and traffic rules for the new access roads to the various infrastructure and activities.	- Mototolo Complex Borwa Vent Shaft: Surface Traffic Management Plan, Valterra (04/08/25) - Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	



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70	Lay down areas must not be located within any watercourses or drainage lines.	Laydown areas at the TCI Site Office, as well as at the disturbed construction areas at the Borwa Downcast South Ventilation Shaft and Borrow Pit 1, are located outside of any watercourses or drainage lines.	Site audit observations and interviews (24/06/25)	
	Remediate/rehabilitate impact:			
71	Topsoil (20 cm, where possible) must be collected and stored in an area of low sensitivity and used to rehabilitate impacted areas that are no longer required during the operational phase (e.g. laydown areas).	- The TCI method statement addresses stripping and stockpiling of topsoil including the removal of topsoil to a depths of between 100 mm - 200 mm from all access roads and footprints to be disturbed and placing the topsoil on designated topsoil stockpiles to be used for the rehabilitation. - Topsoil stockpiles were observed at Borrow Pits 1 and 3. - Topsoil had already been spread (as per the TCI method statement) along the completed brake test ramp embankment and the cut-off berm, prior to placement of the Kaytech Enviromat®, as part of progressive rehabilitation on site.	- Site audit observations and interviews (24/06/25) - Photo 9 - Borrow Pit 1: topsoil stockpiles - Photo 12 - Borrow Pit 3: topsoil stockpiles - Photo 17 - cut-off berm along access route 1 with Enviromat® installed - Photo 20 - Enviromat® installed along the brake test ramp embankment	
72	Only indigenous species must be used for rehabilitation.	- The Agreenco Technical Note describes the surveys undertaken from 10-12 Oct 2023 along the footprints of the proposed ventilation shafts, access roads, powerlines and borrow pits. - Photographic evidence was provided to the auditor of rescue of TOPS, either transplanted directly, or planted in the Mareesburg nursery, as root cuttings, twig cuttings or seeds.	- Technical Note: Assessment of protected plant species in areas earmarked for the development of ventilation shafts and associated infrastructure at the Anglo American Platinum, Mototolo Complex's Borwa Shaft, Agreenco (02/11/23) - Photos 21-24 - rescued and transplanted TOPS, twig cuttings and seeds collected for propagation in the Mareesburg nursery	
73	The alien invasive management plan for the site must be implemented.	- The TCI method statement does not address alien vegetation management, and the Environmental Officer confirmed no IAP have been removed at the construction site. - Mototolo Mine Complex has an Invasive and Alien Vegetation Procedure, which describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Offset impact:				
74	A biodiversity offset must be implemented in during the construction phase and continued during the operational phase in accordance with the approved offset plan to rehabilitate the vegetation and habitat of an existing disturbed area to compensate for the calculated 2.60 ha loss.	No biodiversity offset plan has been developed.	Audit information review and post site audit clarifications	
75	The offset area must be maintained and monitored throughout the construction, operational and decommissioning phases by the ECO.			
76	The ECO must monitor for potential additional plant SCCs not found during search and rescue activities.	This condition is noted by RPM and will be done in conjunction with Agreenco, specifically along the initial section of the powerline, from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, which was not surveyed by Agreenco, due to the 2024 realignment of the powerline route (Figure 5).	- Audit information review and post site audit clarifications - Mototolo APC Borwa Shaft: General & Site Development – Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
77	Plant SCCs must not be removed from the development footprint unless the relevant permits have been obtained.	This condition is noted by RPM.	Audit information review and post site audit clarifications	
Loss of Plant Species of Conservation Concern				
Avoid/prevent impact:				
78	A botanical walkthrough of the development area, by an experienced botanist with knowledge of the SCC identified as possibly occurring within the site, must be undertaken during the flowering season.	Agreenco conducted surveys from 10-12 Oct 2023 along the footprints of the proposed ventilation shafts, access roads, powerlines and borrow pits, identifying TOPS.	Technical Note: Assessment of protected plant species in areas earmarked for the development of ventilation shafts and associated infrastructure at the Anglo American Platinum, Mototolo Complex's Borwa Shaft, Agreenco (02/11/23)	
79	All clearing activities must deploy search and rescue teams in-front of clearing machinery to assist in relocating SCC identified.	Agreenco completed all plant and tree rescues prior to any clearing for construction commenced.	Audit information review and post site audit clarifications	
80	If restricted range SCC populations are found, the development must be moved to avoid these populations.	- Neither the Mar 2022 Terrestrial Biodiversity Specialist Report, nor the Oct 2023 Agreenco Technical note, mention any restricted range SCC populations. - This condition is noted by RPM.	- Proposed development of three ventilation shafts and associated infrastructure at Mototolo Mine, Limpopo Province: Terrestrial Biodiversity Specialist Report, CES (Mar 2022) - Technical Note: Assessment of protected plant species in areas earmarked for the development of ventilation shafts and associated infrastructure at the Anglo American Platinum, Mototolo Complex's Borwa Shaft, Agreenco (02/11/23)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
81	The ECO must monitor for potential additional plant SCCs not found during search and rescue activities.	This condition is noted by RPM and will be done in conjunction with Agreeco, specifically along the initial section of the powerline, from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, which was not surveyed by Agreeco, due to the 2024 realignment of the powerline route (Figure 5).	- Audit information review and post site audit clarifications - Mototolo APC Borwa Shaft: General & Site Development - Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
82	Plant SCCs must not be removed from the development footprint unless the relevant permits have been obtained.	This condition is noted by RPM.	Audit information review and post site audit clarifications	
Impact on faunal species of conservation concern				
	Avoid/prevent impact:			
83	All clearing activities must deploy search and rescue teams in-front of clearing machinery to assist in relocating slower moving faunal species e.g. tortoises.	The Environmental Officer confirmed that all construction routes were driven prior to clearing to relocate faunal species.	Audit information review and post site audit clarifications	
84	This team should focus on checking termite mounds, burrows and dens in particular for small mammals, such as the Blackfooted Cat, moles and rats.			
85	Sensitive species C - Intact habitat patches where these species are known to occur should be buffered (30 m minimum, 100 m recommended) from disturbance taking into account connectivity to other similar habitat, or at least habitats that these species will utilise for migration and dispersal purposes.	No evidence was provided to the auditor on the identification of Sensitive species C, nor of buffering of its preferred habitat.	Audit information review and post site audit clarifications	
Reduced Faunal Habitat				
	Minimize/reduce impact:			
86	The contractor must ensure that vegetation clearance of near-natural, semi-natural and wetland vegetation is restricted to the approved development footprint only.	- The footprint was pegged by the Environmental Officer prior to clearing for construction commenced. - The clearing of near-natural and semi-natural SMB vegetation is limited to the approved infrastructure.	- Site audit interviews (24/06/25) - Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022)	



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87	Construction vehicles and machinery must not be permitted outside of the development footprint, as much as practically possible.	- The TCI Method statement states: 'All vehicles and equipment shall only move on the designated haul roads as agreed with the Engineer.' - No vehicles, plant or equipment shall be allowed to deviate from the existing haul roads.' - A TMP was developed for the construction of the Borwa Ventilation Shafts, and the surface layout plan includes traffic signs and traffic rules for the new access roads to the various infrastructure and activities.	- Mototolo Complex Borwa Vent Shaft: Surface Traffic Management Plan, Valterra (04/08/25) - Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
88	Clearing of trees should take place in winter months, to prevent birds and bats establishing nesting grounds and starting to breed and rear young in the spring and summer months.	- This condition was reiterated in the Oct 2023 Agreenco Technical Note which stated: '<i>The ideal time to transplant most plant species is while they are dormant (June to August).</i>' - TOPS rescues were however conducted during summer and autumn, due to it being required prior to clearing for construction, which commenced on 24 May 2024.	Audit information review and post site audit clarifications	
89	Employees must be prohibited from making open fires during the construction phase.	- The aim of the Mototolo Mine Complex veldfire procedure is to implement veldfire management plans in order to comply with the National Veld and Forest Act No. 101 of 1998, and deals with: 'protection from veld fire, veld fire prevention, veld fire awareness and veld fire preparedness.' - The access gate sign at the Borwa Downcast South Ventilation Shaft construction site states: - No open flames on site. - No smoking in any enclosed area. - Smoking in designated areas only.'	- Mototolo Complex Procedure to prevent veldfires (MOTC-SHE-ENV-PRO-0005) - Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign	
90	The ECO must monitor that all construction activities are conducted within the development footprint.	The Environmental Officer monitors footprint creep.	Site audit observations and interviews (24/06/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Remediate/rehabilitate impact:				
91	All impacted areas must be rehabilitated as per the Rehabilitation Plan, as soon as construction has been completed within each area.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	
Disruption of Ecosystem Function and Process				
Minimize/reduce impact:				
92	The contractor must ensure that vegetation clearance of natural, near-natural and semi-natural vegetation is restricted to the approved development footprint only.	- The footprint was pegged by the Environmental Officer prior to clearing for construction commenced. - The clearing of near-natural and semi-natural SMB vegetation is limited to the approved infrastructure.	- Site audit interviews (24/06/25) - Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022)	
93	Construction vehicles and machinery must not be permitted outside of the development footprint, as much as practically possible.	- The TCI Method statement states: 'All vehicles and equipment shall only move on the designated haul roads as agreed with the Engineer.' 'No vehicles, plant or equipment shall be allowed to deviate from the existing haul roads.' - A TMP was developed for the construction of the Borwa Ventilation Shafts, and the surface layout plan includes traffic signs and traffic rules for the new access roads to the various infrastructure and activities.	- Mototolo Complex Borwa Vent Shaft: Surface Traffic Management Plan, Valterra (04/08/25) - Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
94	Employees must be prohibited from making open fires during the construction phase.	- The aim of the Mototolo Mine Complex veldfire procedure is to implement veldfire management plans in order to comply with the National Veld and Forest Fire Act (Act 101 of 1998), and deals with: 'protection from veld fire, veld fire prevention, veld fire awareness and veld fire preparedness. - The access gate sign at the Borwa Downcast South Ventilation Shaft construction site states: 'No open flames on site.' 'No smoking in any enclosed area.' 'Smoking in designated areas only.'	- Mototolo Complex Procedure to prevent veldfires (MOTC-SHE-ENV-PRO-0005) - Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Remediate/rehabilitate impact:				
95	A rehabilitation plan must be implemented during construction and operation phases.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	
96	All trenches/excavations must be backfilled and all disturbed areas backfilled, compacted and revegetated, where applicable.	- The TCI method statement states: - Backfill around the culvert, gabions and reno mattresses with suitable gravel and compact to 93% mod AASHTO. - Compaction of the backfill must be done simultaneously with every row of gabions laid. - Fill material shall comply with the Engineer's specification in the project drawings and placed in accordance with the Standard Specification for Road and Bridge Works, the relevant SANS 1200 or other international or national backfill specification. - A SIB project is currently underway to rehabilitate the incorrectly disturbed borrow pit area.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
Disturbance to faunal species and potential reduction in abundance and mortality of faunal species				
Minimize/reduce impact:				
97	Vehicles and machinery must meet best practice standards in terms of noise and vibration.	- The TCI method statement states: - All equipment must be certified fit for use and inspected on a daily basis. Records shall be kept by the TCI Safety Department. - Machinery and equipment will be inspected at least monthly and maintained in a safe condition. - Perform maintenance as per the relevant OEM specifications.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
98	Staff and contractors' vehicles must comply with speed limits of 40 km/hr.	- The Mototolo Mine Complex Traffic Management Procedure states: 40 km/hour where sign posted 20 km/hour in all Mototolo Complex Surface Operational areas 16 km/h for all underground operations.' - The Borwa Ventilation Shafts TMP indicates a speed limit of 40 km/h.	- Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030) - Mototolo Complex Borwa Vent Shaft: Surface Traffic Management Plan, Valterra (04/08/25)	
99	Project must start and be completed within the minimum timeframe, i.e. may not be started and left incomplete.	- The 2023 EA states that: '...this activity must commence within 10 years.' - The EA was issued on 02/06/23 and construction commenced on 24/05/24, thus within the specified timeframe. Construction completion is currently scheduled for May 2026.	Audit information review and post site audit clarifications	
100	ECO must walk ahead of clearing construction machinery and move slow moving species e.g. tortoises out of harm's way and into suitable neighbouring habitat.	The Environmental Officer confirmed that all construction routes were slowly driven prior to clearing to relocate faunal species.	Audit information review and post site audit clarifications	
101	Any faunal species that may die as a result of construction must be recorded (photographed, GPS coordinate captured) and if somewhat intact preserved and donated to SANBI.	This condition is noted by RPM.	Audit information review and post site audit clarifications	
102	Any faunal species observed onsite must be recorded (photographed, GPS coordinate captured) and loaded onto iNaturalist.	The Mototolo Mine Complex Biodiversity Criteria and record form for 2025 indicate that the seven active members of the Complex's Biodiversity Project recorded a total of 342 faunal species during 541 observations. These were recorded on iNaturalist, including GPS coordinates plotted on a map and photographic evidence of each observation.	Biodiversity Champion Award 2025: Criteria and record form - Mototolo Mine, Valterra (2025)	
103	Staff and contractors must not be permitted to capture, collect or eat any faunal species onsite.	The Environmental Inductions state that harming of faunal species are prohibited.	Environmental Officer interview (26/06/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Establishment and/or spread of Alien Plant Species				
	Minimize/reduce impact:			
104	The Contractor must implement the Alien Vegetation Management Plan. The ECO must monitor for the adequate implementation of this plan.	- The TCI method statement does not address alien vegetation management, and the Environmental Officer confirmed no invasive alien plants (IAP) have been removed at the construction site. - Mototolo Mine Complex has an Invasive and Alien Vegetation Procedure, which describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009)	
105	The ECO must monitor the site for the presence of alien invasive plant species and take immediate action when these are recorded.	The Environmental Officer confirmed that no IAP management is undertaken on site.	Audit information review and post site audit clarifications	
106	It is recommended that the ECO prepare a photo guide of all invasive plant species likely to occur on site. This will aid in the identification of undesirable species.	No photos of the IAP have been compiled or are displayed on site.	Site audit observations and interviews (24/06/25)	
	Remediate/rehabilitate impact:			
107	All previously infested areas must be rehabilitated as per the Rehabilitation Plan, to the satisfaction of the appointed ECO, as soon as construction has been completed within each area.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreenco Environmental Projects (Pty) Ltd (Agreenco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreenco (07/01/25)	
Heritage Impacts				
Loss of archaeological feature				
108	No mitigation Required	-	-	
Loss of historically significant building and structures				
109	No mitigation Required	-	-	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Alternation of cultural landscape				
110	• No mitigation Required	-	-	N/A
Disturbance to graves/human burial sites				
111	• No mitigation Required	-	-	N/A
River and Wetland Impact				
Direct ecosystem modification or destruction / loss impacts				
	Avoid/prevent:			
112	• Construction materials must not be stored within the moderate sensitivity areas.	• The topsoil and aggregate stockpiles are outside of the moderately important ephemeral streams. • The topsoil stockpiles at Borrow Pit 3 are within the highly sensitive near-natural SMB vegetation and the topsoil stockpiles at Borrow Pit 1, within the semi-natural SMB vegetation type, which was assigned a moderate sensitivity.	• Photo 1 - BAR: Figure 3.23 (Site vegetation and land use map of the proposed ventilation shafts), CES (Oct, 2022) • BAR: Figure 3.29 (Terrestrial Biodiversity Site Ecological Importance (SEI) map of the proposed ventilation shafts) and Figure 3.30 (Ecological Importance and Sensitivity (EIS) map of the study area), CES (Oct, 2022)	X
113	• Stockpiles must not be stored within the moderate sensitivity areas.			X
114	• Optimally, a buffer of 50 m should be maintained between the riparian edge and the edge of the ventilation shafts, emulsion shaft and borrow pits. Should this not be feasible, a minimum buffer of 30 m should be maintained.	• The Borwa Downcast South Ventilation Shaft and Borrow Pits 1 and 3, part of the current construction, are all more than 50 m away from the delineated distinct watercourse units (<i>within 100 m from the infrastructure and activities</i>) as per the approved BAR. • Borrow material was incorrectly collected north of the approved Borrow Pit 1 location, but the area is still outside of the delineated 1:100 year floodline of the closest watercourses. • A SIB project is currently underway to rehabilitate this area.	• Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated	✓



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
115	- The following best practice powerline crossing alignment measures must be implemented: - The number of stream / river crossings must be minimised as far as practically possible. - Unnecessary watercourses crossings (i.e. proposed crossings that can be re-aligned) must be re-aligned and avoided.	- The BAR (Figure 3) shows that the proposed powerline follows the access road, within the limitations of straight lines, but the Environmental Officer's May 2025 internal compliance audit states that the initial powerline plan in the BAR has not been followed and it has been rerouted. - The 2024 rerouted initial section of the powerline (Figure 5), from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, will however now cross three drainage lines vs the one crossing in the 2022 BAR alignment. It appears from Figure 5 that only the electric cable will cross the drainage lines, with the poles placed outside of the delineated watercourses.	- Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (May 2025) - Mototolo APC Borwa Shaft: General & Site Development - Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
116	- The following temporary access road alignment measures must be implemented: - No new road watercourse crossings should be established as part of the development of the service roads. - All service roads should follow the existing road network as far as practically possible. - If new watercourse crossings are required, the number of new crossings must be minimised as far as practically possible. Unnecessary watercourse crossings (i.e. proposed crossings that can be re-aligned) must be re-aligned and avoided. - Except at planned watercourse crossings, where new service roads are aligned near watercourses, a minimum buffer of 30 m should be maintained between the riparian edge and the edge of the road as far as practically possible.	- The service and maintenance roads are the same as the access roads, which all follow the existing prospecting roads. - No additional watercourse crossings are required. - There are 15 drifts, where the various access roads cross the ephemeral drainage lines. - The remainder of the access roads are outside of the main delineated drainage lines.	Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022)	
Minimize/reduce:				
117	Construction activities should be undertaken during the driest part of the year to minimize erosion and downstream sedimentation due to excavation, etc.	Construction commenced in autumn (May 2024), thus at the start of the dry months, but will be continuous until May 2026, and thus throughout two rain seasons.	- Audit information review and post site audit clarifications <i>This commitment should be rephrased in/removed from the BAR, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine.</i>	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
118	Appropriate stormwater structures must be implemented during construction to control run-off and minimize erosion.	- The TCI method statement describes the gabions, geotextile and reno mattresses installed/being installed at each of the drifts and culvert crossings where the access roads cross the drainage lines, to prevent erosion and capture runoff sediment. - The method statement also states that v-drains are cut through windrows at the road edges, to divert water to the surrounding environment.	- Site audit observations and interviews (24/06/25) - Photo 13 - gabions, geotextile and reno mattresses at Drift 1 - Photo 14 - gabions, geotextile and reno mattresses at Drift 5 - Photos 15-16 - gabions upgradient and downgradient of the downcast vent shaft terrace	
119	Vegetation clearing must be kept a minimum and only to the site footprint.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area.	- Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated - Site audit observations and interviews (24/06/25)	
120	Erosion controls and sediment trapping measures must be put in place.	The TCI method statement describes the gabions, geotextile and reno mattresses installed/being installed at each of the drifts and culvert crossings where the access roads cross the drainage lines, to prevent erosion and capture runoff sediment.	- Site audit observations and interviews (24/06/25) - Photo 13 - gabions, geotextile and reno mattresses at Drift 1 - Photo 14 - gabions, geotextile and reno mattresses at Drift 5 - Photos 15-16 - gabions upgradient and downgradient of the downcast vent shaft terrace	
121	Stockpiles must be monitored for erosion and mobilisation of materials towards watercourses.	The stockpiles are monitored by the Environmental Officer, but some erosion gullies were observed on the stockpiles at Borrow Pit 1.	- Site audit observations and interviews (24/06/25) - Photo 10 - erosion gullies along the topsoil stockpiles	
122	Stockpiles must not exceed 1.5m in height. Stockpiles must be covered during windy periods.	Stockpiles at Borrow Pit 1 are higher than 1.5 m and are not covered during windy periods.	Site audit observations and audit information review (24/06/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
123	- Best practice powerline crossing alignment measures must be implemented. Where wetland and stream / river crossings are required, every effort should be made to minimize the impacts by considering the following: - Crossing points should be aligned along areas or corridors of existing disturbance e.g. along existing road crossings. - The length of wetlands and rivers / streams crossed at each crossing must be minimised by adjusting alignments to coincide with narrower sections and ensuring that crossings cross perpendicular to flow.	- The BAR (Figure 3) shows that the proposed powerline follows the access road, within the limitations of straight lines, but the Environmental Officer's May 2025 internal compliance audit states that the initial powerline plan in the BAR has not been followed and it has been rerouted. - The construction drawing for the 2024 powerline route (Figure 5) shows that it has been realigned to more closely follow the proposed access roads/existing prospecting roads. - The 2024 rerouted initial section of the powerline, from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, will however now cross three drainage lines vs the one crossing in the 2022 BAR alignment. It appears from Figure 5 that only the electric cable will cross the drainage lines, with the poles placed outside of the delineated watercourses.	- Mototolo Borwa Ventilation Shaft: Roads & Drainage: Site overview design: General Arrangement, Redco (27/05/24) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (May 2025) - Mototolo APC Borwa Shaft: General & Site Development - Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
Remediate/rehabilitate:				
124	Disturbed areas must be monitored for erosion channels and these must be rehabilitated.	- Disturbed areas are monitored by the Environmental Officer and no erosion was observed. - Erosion gullies were however observed on the stockpiles at Borrow Pit 1, and require rehabilitated.	Photo 10 - Borrow Pit 1: erosion gullies along the topsoil stockpiles	
125	All trenches/excavations must be backfilled and all disturbed areas backfilled, compacted and revegetated, where applicable.	- The TCI method statement states: 'Backfill around the culvert, gabions and reno mattresses with suitable gravel and compact to 93% mod AASHTO. - Compaction of the backfill must be done simultaneously with every row of gabions laid. - Fill material shall comply with the Engineer's specification in the project drawings and placed in accordance with the Standard Specification for Road and Bridge Works, the relevant SANS 1200 or other international or national backfill specification.' - A SIB project is currently underway to rehabilitate the incorrectly disturbed borrow pit area.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Ecological connectivity and edge disturbance impacts				
	Avoid/prevent:			
126	- The following temporary access road alignment measures must be implemented: - No new road watercourse crossings should be established as part of the development of the service roads. - All service roads should follow the existing road network as far as practically possible. - If new watercourse crossings are required, the number of new crossings must be minimised as far as practically possible. Unnecessary watercourse crossings (i.e. proposed crossings that can be re-aligned) must be re-aligned and avoided. - Except at planned watercourse crossings, where new service roads are aligned near watercourses, a minimum buffer of 30 m should be maintained between the riparian edge and the edge of the road as far as practically possible.	- The service and maintenance roads are the same as the access roads, which all follow the existing prospecting roads. - No additional watercourse crossings are required. - There are 15 drifts, where the various access roads cross the ephemeral drainage lines. - The remainder of the access roads are outside of the main delineated drainage lines.	Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022)	
	Minimize/reduce:			
127	Construction activities should be undertaken during the driest part of the year to minimize erosion and downstream sedimentation due to excavation, etc.	Construction commenced in autumn (May 2024), thus at the start of the dry months, but will be continuous until May 2026, and thus throughout two rain seasons.	- Audit information review and post site audit clarifications <i>This commitment should be rephrased in/removed from the BAR, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine.</i>	
128	Vegetation clearing must be kept a minimum and only to the site footprint.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area.	- Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated - Site audit observations and interviews (24/06/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
	Remediate/rehabilitate:			
129	All trenches/excavations must be backfilled and all disturbed areas backfilled, compacted and revegetated, where applicable.	- The TCI method statement states: 'Backfill around the culvert, gabions and reno mattresses with suitable gravel and compact to 93% mod AASHTO. - Compaction of the backfill must be done simultaneously with every row of gabions laid. - Fill material shall comply with the Engineer's specification in the project drawings and placed in accordance with the Standard Specification for Road and Bridge Works, the relevant SANS 1200 or other international or national backfill specification.' - A SIB project is currently underway to rehabilitate the incorrectly disturbed borrow pit area.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
Water pollution impacts				
	Avoid/prevent:			
130	No concrete mixing must take place within 32 m of any watercourse.	- Trucks deliver premixed concrete to site. - No mixing of concrete/cement takes place on site. - No evidence of concrete/cement waste was observed on site.	Post site audit clarifications	
131	No machinery must be parked overnight within 50 m of the rivers/wetlands.	- The parking areas are both outside of the 1:100 year floodline of the delineated watercourses. - The Environmental Officer confirmed that drip trays are placed underneath all parked vehicles and machinery.	Site audit observations (24/06/25) and post site audit clarifications	
132	All stationary machinery must be equipped with a drip tray to retain any oil leaks.			
133	Chemicals used for construction must be stored safely on bunded surfaces in the construction site camp.	- All required hazardous substances are stored in a chemical storage cage in a concrete bunded area at the TCI Site Office. - Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure.	- Photo 5 - chemical cage in concrete bunded area - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure, TCI (TCI/SOP/ENV/011)	
134	No ablution facilities must be located within 50 m of any river or wetland system.	The portable toilets are placed outside of the delineated watercourses.	Photo 19 - chemical toilets on site	
135	Chemical toilets must be regularly maintained/serviced to prevent ground or surface water pollution.	The toilets are maintained and managed by an external contractor.	Site audit observations and interviews (24/06/25)	



#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
136	Any hazardous substances/waste must be stored in impermeable bunded areas or secondary containers 110% the volume of the contents within it.	- All required hazardous substances are stored in a chemical storage cage in a concrete bunded area at the TCI Site Office. - Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure.	- Photo 5 - chemical cage in concrete bunded area - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure , TCI (TCI/SOP/ENV/011)	
137	All general waste and refuse must be removed from site and disposed and windproof temporary storage area before being disposed of at a registered landfill site.	- A bunded waste management station with the different domestic waste separation bins is located at Borrow Pit 1. - The waste bins are removed off-site to the Borwa salvage yard for sorting and disposal. - Waste Legends' (Mototolo Mine Complex external waste contractor) monthly waste recon shows separate disposal of domestic and hazardous waste at the applicable licenced facilities.	- Photo 4 - waste management station - Post site audit clarifications - Waste Recon: Mototolo - Borwa, Waste Legends, 2025	
Remediate/rehabilitate:				
138	Emergency plans must be in place in case of spillages onto bare soil or within water courses.	- The Hydrocarbon Management Procedure details the actions required for spills on soil/land, including: <i>'Contaminated soil to be taken to a bioremediation site (if one exists) or treated in-situ with bioremediation agents</i> <i>If no bioremediation is to be undertaken, the contaminated soil must be placed into a hazardous waste bin / skip for transportation to a ZW2L facility.'</i> - The Hydrocarbon Management Procedure states that: <i>'All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment.'</i> - The Incident Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Incident Management Procedure also refers to incident action plans.	- Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007)	



Table 4: Borwa Ventilation Shafts, Emulsion Borehole and Overhead line BAR - EA (Jun, 2023) Compliance Audit Results

#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
EA SITE SPECIFIC CONDITIONS					
139	1	All necessary permitting and authorisations must be obtained prior to the commencement of any construction activities.	- The RPM Environmental and Permitting Teams ensured that all authorisations, licences and permits were obtained prior to construction commencing, including: - EA for the Borwa Ventilation Shafts BAR - Registration of Water Use in terms of GA for Section 21 (c) and/or (i) of the NWA as gazetted in GN 509 dated 26 Aug 2016 - Protected trees permit for the farms Richmond 370 KT and Thorncliffe 374 KT - Protected plants permit for Richmond 370 KT and Thorncliffe 374 KT.	- Environmental Authorisation in terms of NEMA and the EIA Regulations, 2014 for mining associated with infrastructural activities within the Sekhukhune District Municipality: Limpopo Region, DMRE (02/06/23) - Registration of Water Use in terms of Section 39 of the NWA, No 36 of 1998 for Anglo American Platinum Limited: Proposed development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead Line in Quaternary Catchment B41G-Olifants, Mpumalanga DWS (03/04/23) - Licence LP-SDM-0216-223-24: 04 Mar 2024 to 04 Mar 2025: to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of Section 15(1) of the National Forests Act, 1998, DFFE (04/03/2024) - Wildlife Trade and Regulation Permit to pick protected plants on Richmond 370 KT & Thorncliffe 374 KT, LDEDET (11/06/24)	
140	2	An Erosion Management Plan/ Method Statement must be developed prior to the commencement of construction activities in order to mitigate the unnecessary loss of topsoil and runoff.	- The TCI method statement describes the gabions, geotextile and reno mattresses installed/being installed at each of the drifts and culvert crossings where the access roads cross the drainage lines, to prevent erosion and capture runoff sediment. - The method statement also states that v-drains are cut through windrows at the road edges, to divert water to the surrounding environment. - Berms have also been constructed at the topsoil stockpiles and a cut-off berm along access route 1.	Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
141	3	An Alien Invasive Vegetation Management Plan must be compiled, implemented and adhered to during all phases of the proposed development.	- The TCI method statement does not address alien vegetation management, and the Environmental Officer confirmed no IAP have been removed at the construction site. - Mototolo Mine Complex has an Invasive and Alien Vegetation Procedure, which describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009)	
142	4	The approved Rehabilitation Plan should be implemented and adhered to. Only indigenous plant species typical of the local vegetation should be used for rehabilitation purposes.	- The TCI method statement mentions that the stockpiled topsoil will be used in rehabilitation. - A checklist was provided to the auditor listing the steps and including photographic evidence of rehabilitation of the disturbed brake test ramp footprint. The checklist was developed by Agreeco Environmental Projects (Pty) Ltd (Agreeco) and approved/signed off by the Borwa Environmental Officer, RPM Site Manager and TCI Contracts Manager. - The Agreeco Technical Note describes the surveys undertaken from 10-12 Oct 2023 along the footprints of the proposed ventilation shafts, access roads, powerlines and borrow pits. - Photographic evidence was provided to the auditor of rescue of TOPS, either transplanted directly, or planted in the Mareesburg nursery, as root cuttings, twig cuttings or seeds.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Quality Control Inspection (QCI) Checklist: Mototolo Brake Test Ramp Rehabilitation, Agreeco (07/01/25) - Technical Note: Assessment of protected plant species in areas earmarked for the development of ventilation shafts and associated infrastructure at the Anglo American Platinum, Mototolo Complex's Borwa Shaft, Agreeco (02/11/23) - Photos 21-24 - rescued and transplanted TOPS, twig cuttings and seeds collected for propagation in the Mareesburg nursery	
143	5	An ECO must be appointed for the duration of the proposed development.	RPM notified the DMPR of the appointment of the ECO for the Borwa Ventilation Shafts on 18 July 2024.	Notification and Provision of Information to the Department (SHE/2024/563), RPM (18/07/24)	
ANNEXURE 2					
Departmental Standard Conditions					
1. Scope of the Authorisation					
144	1.1	The holder of EA shall be responsible for ensuring compliance with the conditions contained in the EA. This includes any person acting on the holder's behalf, including but not limited to an agent, servant, contractor, subcontractor, employee, consultant or any person rendering a service to the holder of IEA.	The Environmental Officer conducts monthly internal compliance audits of the construction project against the conditions of the EA.	Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Jan-May 2025 and Aug-Dec 2024)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
145	1.2	Any changes to, or deviation from the project description set out in this EA must be approved in writing by this Department before such changes or deviation may be effected. In assessing whether to grant such approval or not, the Department may request such information as is deemed necessary to evaluate the significance and impacts of such changes or deviation and it may be necessary for the holder of the EA to apply for further authorisation in terms of the EIA Regulations.	- Borrow material was incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area. - The 2024 powerline route has also been realigned to more closely follow the proposed access roads/existing prospecting roads, and still falls within the Agreenco surveyed footprints for most of the route. - The project description has not changed, and the 2022 BAR conditions required placement of infrastructure so as to avoid sensitive areas and siting of supporting infrastructure to follow existing disturbed corridors. - This condition is thus noted by RPM.	- Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - indicating the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (May 2025) - Mototolo APC Borwa Shaft: General & Site Development - Borwa Shaft Overhead Power Lines Layout, N.T.S. (27/08/24)	
146	1.3	The activities, which are authorised, may only be carried out at the property (ies) indicated in the EA and or on the approved EMPr.	Current construction activities are limited to the farms Richmond 370 KT and Thorncliffe 374 KT, as authorised in the EA and approved BAR.	Site audit observations and audit information review (24/06/25)	
147	1.4	Where any of the holder of the EA contact details change including name of the responsible person, physical or postal address/or telephonic details, the holder of the IEA must notify the Department as soon as the new details become known to the holder of the EA.	- The holder of the EA is Rustenburg Platinum Mines Limited (RPM), a wholly owned subsidiary of Valterra Platinum (Valterra). - RPM sent letters to the Regional Manager and Principal Inspector of Mines (Department of Mineral and Petroleum Resources: Limpopo) advising them in writing of the company name change from Anglo American Platinum Limited to Valterra Platinum Limited on 8 May 2025.	The Principal Inspector of Mines - DMPR: Limpopo, RPM (8 May 2025)	
148	1.5	The EA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the undertaking of such activity (ies).	- This condition is noted by RPM. - All the required authorisations, licences and permits were obtained prior to construction commencing, including the water use GA, as well as the protected tree and plant permits.	- Registration of Water Use in terms of Section 39 of the NWA, No 36 of 1998 for Anglo American Platinum Limited: Proposed development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead Line in Quaternary Catchment B41G-Olifants, Mpumalanga DWS (03/04/23) - Licence LP-SDM-0216-223-24: 04 Mar 2024 to 04 Mar 2025: to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of Section 15(1) of the National Forests Act, 1998, DFFE (04/03/2024) - Wildlife Trade and Regulation Permit to pick protected plants on Richmond 370 KT & Thorncliffe 374 KT, LDEDET (11/06/24)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
149	1.6	The holder of EA must ensure that all areas where the authorised activities occur have controlled access to ensure safety of people and animals.	- Access to the Mototolo Mine Complex is controlled by RPM Protection services, including fencing, turnstiles and access cards. - Access to the Borwa Downcast South Ventilation Shaft construction site is fenced with a security gate in place, and permanent security.	Photos 26-27 - Borwa Downcast South Ventilation Shaft construction site: access gate and fencing	
2. Appeal of Authorisation					
150	2.1	The holder of EA must in writing, within 14 (fourteen) calendar days from the date of this decision and in accordance with EIA Regulation 4(2) do the following:	- The EA was granted on 02/06/23. - CES sent email notification to all registered I&APs on 05/06/23, thus within 3 days of the decision.	Notification of Environmental Authorisation granted for the Proposed Development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead line at Mototolo Mine, Limpopo Province, Alex Ndlovu <a.ndlovu@cesnet.co.za> (05/06/23)	
151	2.2	- Notify all registered I&APs of – 2.2.1 The outcome of the application; 2.2.2 The date of the decision; 2.2.3 The date of issue of the decision and; 2.2.4 The reasons for the decision as included in Annexure 1 and Departmental Standard Conditions in Annexure 2.	- The CES notification email included: - o the outcome of the application - o the date of the decision (02/06/23) - o the date of issue of the decision (06/06/23) - o the reason for the decision referencing Annexure 1 of the EA attached to the email - o the full EA including Annexure 2.	Notification of Environmental Authorisation granted for the Proposed Development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead line at Mototolo Mine, Limpopo Province, Alex Ndlovu <a.ndlovu@cesnet.co.za> (05/06/23)	
152	2.3	Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations.	The CES notification email states that an appeal may be lodged against the decision within a 20-day period, with the deadline stated in bold as 25/06/23.		
153	2.4	Draw the attention of all registered I&APs to the manner in which they may access the decision.	The CES notification email explains that an appeal can be lodged to the DFFE and a copy to the DMRE, via email, by post or by hand, with address details provided.		
154	2.5	- Provide the registered I&APs with: 2.5.1 Name of the holder (entity) of this EA; 2.5.2 Name of the responsible person for this EA; 2.5.3 Postal address of the holder; 2.5.4 Telephonic and fax details of the holder; 2.5.5 E-mail address of the holder if any.	- The CES notification email included the EA as an attachment, which lists on Page 1 the holder of the EA (RPM), responsible persons, postal address and email addresses of the responsible persons. - Page 4 of the EA again lists the holder of the EA, as well as the postal and telephonic details.		



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
3. Commencement of the Activity (ies)					
155	3.1	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	- The TCI method statement includes a section on PPE and states that: <i>'Personnel will be issued with PPE to protect them from workplace hazards which cannot be eliminated or reduced to an acceptable level by other controls.'</i> - The construction site access gate safety sign also indicates the required PPE to be worn on site. - Employees and contractors were all observed wearing PPE.	- Photo 8 - Borwa Downcast South Vent Shaft construction site - access gate sign - Photo 27 - Borwa Downcast South Vent Shaft construction site - fencing and PPE worn	
156	3.2	This IEA must be provided to the site operator and the requirements thereof must be made fully known to him or her.	- Electronic copies of the 2022 BAR and associated 2023 EA are available on site. - The BAR and EA conditions were shared with the TCI contractors on site during a Project Meeting in Oct 2024, with the Attendance Register attached to the Environmental Officer's Nov 2024 Internal Compliance Audit.	- Site audit interviews (24/06/25) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Nov 2024) - Borwa Vent Shaft Project Meeting Attendance Register (08/10/24)	
157	3.3	Hauling routes for construction vehicles and machinery must be clearly marked and appropriate signalling must be posted to that effect. Furthermore, movement of construction vehicles and machinery must be restricted to areas outside of the drainage line or wet areas.	- The TCI Method statement states: <i>'All vehicles and equipment shall only move on the designated haul roads as agreed with the Engineer.'</i> <i>'No vehicles, plant or equipment shall be allowed to deviate from the existing haul roads.'</i> - A TMP was developed for the construction of the Borwa Ventilation Shafts, and the surface layout plan includes traffic signs and traffic rules for the new access roads to the various infrastructure and activities.	- Mototolo Complex Borwa Vent Shaft: Surface Traffic Management Plan, Valterra (04/08/25) - Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24)	
158	3.4	Appropriate notification sign must be erected at the construction site, warning the public (residents, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.	- The TCI method statement states: <i>'Signs & Barricading. It shall be ensured that safety signs are erected to warn workers and visitors of specific hazards and to communicate necessary precautionary measures and emergency actions. Barricading controls shall also be implemented and authorised as part of the incident management and emergency response procedures.'</i> - The access gate sign at the Borwa Downcast South Ventilation Shaft construction site contains various hazard warnings such as heavy plant and machinery, open and unmarked holes and high voltage equipment.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
159	3.5	Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of storm water runoff.	- The TCI method statement describes the gabions, geotextile and reno mattresses installed/being installed at each of the drifts and culvert crossings where the access roads cross the drainage lines, to prevent erosion, capture runoff sediment and allow natural water flow. - The method statement also states that v-drains are cut through windrows at the road edges, to divert water to the surrounding environment.	Site audit observations and interviews (24/06/25)	
160	3.6	Vegetation clearance must be limited areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area. - Erosion measures have been/are being implemented, but no IAP eradication has been conducted at the construction site.	- Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated - Site audit observations and interviews (24/06/25)	
161	3.7	The holder of IEA must note that in terms of the National Forest Act (Act No. 84 of 1998) protected plant species, also listed in Limpopo Environmental Management Act (Act no. 7 of 2003) must not be cut, disturbed, damaged, destroyed and their products must not be possessed, collected, removed, transported, exported, donated, purchased or sold unless permission is granted by the Department of Agriculture, Forestry and fisheries.	- The RPM Environmental and Permitting Teams ensured that all authorisations, licences and permits were obtained prior to construction commencing, including: - Protected trees permit for the farms Richmond 370 KT and Thorncliffe 374 KT - Protected plants permit for Richmond 370 KT and Thorncliffe 374 KT.	- Licence LP-SDM-0216-223-24: 04 Mar 2024 to 04 Mar 2025: to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of Section 15(1) of the National Forests Act, 1998, DFFE (04/03/2024) - Wildlife Trade and Regulation Permit to pick protected plants on Richmond 370 KT & Thorncliffe 374 KT, LDEDET (11/06/24)	
162	3.8	Construction areas (e.g. material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.	- Laydown areas at the TCI Site Office, as well as at the disturbed construction areas at the Borwa Downcast South Ventilation Shaft and Borrow Pit 1, are located outside of any watercourses or drainage lines. - All hazardous substances are stored in chemical cages, on a concrete surface with bund walls, at the TCI Site Office. - The stripped topsoil is stockpiled at Borrow Pits 1 and 3. Aggregate, for use in construction, is also stockpiled at Borrow Pit 1. These are all outside of drainage lines.	Site audit observations and interviews (24/06/25)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
163	3.9	If any soil contamination is noted at any phase of the proposed activity (ies), the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this Department must be informed in this regard.	- The Hydrocarbon Management Procedure details the actions required for spills on soil/land, including: - o <i>'Contaminated soil to be taken to a bioremediation site (if one exists) or treated in-situ with bioremediation agents</i> - o <i>If no bioremediation is to be undertaken, the contaminated soil must be placed into a hazardous waste bin / skip for transportation to a ZW2L facility.'</i>	Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	
164	3.10	An integrated waste management approach must be implemented that is based on waste minimization and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate. Uncontaminated rubble generated on the premises can be re-used as back filling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited on the adjacent properties or public places and open space.	- The TCI method statement addresses waste management, waste reduction, waste collection and disposal, stating that: <i>'Waste generated during construction (hazardous, domestic, and concrete spoil) will be handled as detailed in Waste Management procedure.'</i> - Waste at Mototolo Mine Complex is managed in line with the Waste Management Procedure. - Waste Legends' (Mototolo Mine Complex external waste contractor) monthly waste recon shows separate disposal of domestic and hazardous waste at the applicable licenced facilities. - A bunded waste management station with domestic waste separation bins is located at Borrow Pit 1.	- Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) - Waste Recon: Mototolo - Borwa, Waste Legends, 2025 - Photo 4 - waste management station	
165	3.11	In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the National Water Act, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the holder of the IEA reads through and understand the legislative requirements pertaining to the project. It is the Applicant's responsibility to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.	- This condition is noted by RPM. - The BAR and EA conditions were shared with the TCI contractors on site during a Project Meeting in Oct 2024, with the Attendance Register attached to the Environmental Officer's Nov 2024 Internal Compliance Audit.	- Borwa Vent Shaft Project Meeting Attendance Register (08/10/24) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Nov 2024)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
166	3.12	Construction vehicle must be serviced and maintained in the manner whereby no excessive smokes and noise production is reduced to acceptable levels, and to prevent oil leaks. Contaminated soil must be remediated on site or removed to an authorised landfill site.	- The TCI method statement states the following for Plant & Equipment: - o <i>Prior to arriving on site all earthworks equipment will have a documented premobilization inspection.</i> - o <i>All earthwork equipment will have daily, documented pre-start inspections, as per relevant company procedure.</i> - o <i>Machinery and equipment will be inspected at least monthly and maintained in a safe condition.</i> - o <i>Perform maintenance as per the relevant OEM specifications.</i> - The Hydrocarbon Management Procedure details the actions required for spills on soil/land, including: - o <i>Contaminated soil to be taken to a bioremediation site (if one exists) or treated in-situ with bioremediation agents</i> - o <i>If no bioremediation is to be undertaken, the contaminated soil must be placed into a hazardous waste bin / skip for transportation to a ZW2L facility.</i>	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	
167	3.14	Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	- This condition is noted by RPM. - Annual noise monitoring is undertaken at the Mototolo Mine Complex boundary, at various locations within the Complex and at the closest sensitive receptors. - The latest 2024 annual noise monitoring report recorded noise measurements at Borwa Shaft as below the SANS 10103:2008 industrial limit of 70 dBA: - o DN-B-1 (Day: 54.9 dBA and Night: 57.2 dBA) and DN-B-2 (Day: 56.1 dBA and Night: 54.1 dBA). - Readings at the closest sensitive receptors east and west of the Borwa Shaft, were all below the residential SANS 10103:2008 limits during the day (<55 dBA) and night (< 45 dBA).	Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
168	3.15	Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust.	- The TCI method statement states: 'Dust suppression shall be performed with the available water trucks on site. Haul roads shall be kept dust free at all times. - Dust suppression and control will be implemented as outlined in the dust control procedure.' - No dust plumes were observed on site during the audit.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Site audit observations and interviews (24/06/25)	
169	3.16	Mixing of cement, concrete, paints, solvent, sealants and adhesive must be done in specified areas on concrete aprons or on protected plastic linings to contain spillage or overflow onto soil to avoid contamination of underground water and environmental damage.	- Trucks deliver premixed concrete to site. - No mixing of concrete/cement takes place on site. - No evidence of concrete/cement waste was observed on site.	Site audit observations (24/06/25) and post site audit clarifications	
170	3.17	- Should any heritage remains be exposed during operation or any actions on the site, these must immediately be reported to the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA) (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA). - Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; middens, indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	- The Cultural Heritage Chance Find Procedure describes the framework steps to be followed for any Chance Finds, as follows: 'Stop all works in the vicinity of the find. Notify the person in charge. - Delineate and secure the area, take photos and record details. - Preliminary evaluation by qualified specialists. - If finds are significant, notify the relevant authorities. - Await investigation by relevant authorities. - Construction/Operations resume following implementation of investigation's findings and written permission from authorities.' - The Cultural Heritage Procedure also defines the various types of heritage remains. - The employees and contractors all attended the Cultural Heritage induction.	- Mototolo Complex Cultural Heritage Chance Find Procedure (MOTC-ALL-SER-PRO-0004) - Mototolo Complex Cultural Heritage Employee and contractor induction	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
171	3.18	Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.	- The aggregate and topsoil stockpiles at Borrow Pit 1 were observed to be free from any hydrocarbon contamination. - The stockpiles are monitored by the Environmental Officer.	- Photo 9 - Borrow Pit 1: topsoil stockpiles - Photo 11 - Borrow Pit 1: aggregate stockpiles	
172	3.19	Hydraulic fluid or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned immediately by removing spillage together with the polluted solids and dispose it in the authorised disposal site permitted of such waste. The regional office of the Department of Water and Sanitation must be notified within 24 hours of an incident that may pollute surface and underground water resources.	- All required hazardous substances are stored in a chemical storage cage in a concrete bunded area at the TCI Site Office. - Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure. - No spills were observed on site. - The Mototolo Incident Register for 2024-2025 was provided to the auditor and does not include any incidents related to the construction of the Borwa Ventilation Shafts.	- Photo 5 - chemical cage in concrete bunded area - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure , TCI (TCI/SOP/ENV/011) - Mototolo Complex Environmental Incident Register - 2025	
173	3.20	Chemical sanitation facilities or system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorised waste water treatment works.	- Chemical toilets are provided site-wide. - The toilets are maintained and managed by an external contractor.	- Photo 19 - chemical toilets on site - Site audit observations and interviews (24/06/25)	
174	3.21	The holder of EA must ensure that any water uses listed in terms of Section 21 of National Water Act must get authorization from Department of Water and Sanitation prior to the commencement of such activity (ies).	The RPM Environmental and Permitting Teams ensured that all authorisations, licences and permits were obtained prior to construction commencing, including the Registration of Water Use in terms of GA for Section 21 (c) and/or (i) of the NWA as gazetted in GN 509 dated 26 Aug 2016.	Registration of Water Use in terms of Section 39 of the NWA, No 36 of 1998 for Anglo American Platinum Limited: Proposed development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead Line in Quaternary Catchment B41G-Olifants, Mpumalanga DWS (03/04/23)	
175	3.22	This EA does not purport to absolve the holder of EA from its common law obligations towards the owner of the surface of land affected.	- RPM is the registered surface rights owner of the farm Richmond 370 KT (<i>RE and portions 1 and 2</i>). - RPM furthermore concluded a Use and Access Agreement with Glencore Operations South Africa (Pty) Ltd, for the use of the old Mototolo JV portions of Thorncliffe 374 KT (<i>part of portions 1, 3 and 7</i>).	Post site audit clarifications	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
176	3.23	This EA may be amended or withdrawn at any stage for non-compliance and provides no relief from the provisions of any other relevant statutory or contractual obligations.	This condition is noted by RPM.	Site interviews (24/06/25)	
177	3.24	The holder of EA must note that in terms Section 43A of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), residue deposit and residue deposit must be deposited and managed in a prescribed manner on any site demarcated for that purpose in the Environmental Management Plan or Environmental Management Programme. No person may temporary or permanently deposits residue stockpile or residue deposit on any area or site other than on site indicated on the Environmental Management Plan or Environmental Management Programme.	- There are no residue deposits nor residue stockpiles at the current construction areas. - This condition is noted by RPM.	Site audit observations and interviews (24/06/25)	
178	3.25	The holder of EA must note that in terms Section 20 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), no person may commence, undertake or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of Section 19 (3) for that activity or a waste management licence is issued in respect of that activity if licence is required.	- There are no waste management activities at the current construction areas. - This condition is noted by RPM.	Site audit observations and interviews (24/06/25)	
179	3.26	An appeal under Section 43 (7) of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended) suspend an IEA or exemption or any provisions of conditions attached hereto, or any directive unless the Minister directs otherwise.	This condition is noted by RPM.	Site interviews (24/06/25)	
180	3.27	Should you be notified by the Minister of a suspension of the authorisation pending appeal procedure, you may not commence with the activity (ies) until such time that the Minister allows you to commence with such activity (ies) in writing.	This condition is noted by RPM.	Site interviews (24/06/25)	
181	3.28	The Department reserves the right to audit and/or inspect the activity (ies) without prior notification at any reasonable time and at such frequency as may be determined by the Regional Manager.	This condition is noted by RPM.	Site interviews (24/06/25)	



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182	3.29	The waste storage site must have a firm, impermeable, chemical resistant floors and a roof to prevent direct sunlight and rain water from getting in contact with the waste.	- The bunded waste management station with the different domestic waste separation bins at Borrow Pit 1, has concrete floor. The bins are partly underneath the shade net, which covers the adjacent eating area. - The waste bins are removed off-site to the Borwa salvage yard for sorting and disposal. - The Borwa salvage yards has a cast concrete slab. The bunded areas have not been treated with a chemical resistant nor impermeable paint or material. Roofing over the area is not practical due to lifting equipment access required when removing the waste skips.	- Photo 4 - waste management station - Post site audit clarifications	
183	3.30	The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming into contact with the waste and must be diverted away from the storage site.	- All required hazardous substances are stored in a chemical storage cage in a concrete bunded area at the TCI Site Office. - Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure.	- Photo 5 - chemical cage in concrete bunded area - Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure , TCI (TCI/SOP/ENV/011)	
184	3.31	Subject to the commencement and duration requirements of the MPRDA and NEMA for the listed mining activity is valid for the period for which the aforesaid right is granted provided that this activity must commence within 10 years. If the commencement of the proposed activity does not occur within the specified period, the EA lapses and a new application for EA in terms of the NEMA and the EIA Regulations should be made for the activity to be undertaken.	The EA was issued on 02/06/23 and construction commenced on 24/05/24, thus within the specified timeframe. Construction completion is currently scheduled for May 2026.	Audit information review and post site audit clarifications	
185	3.32	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.	The planning phase is complete and the construction phase is currently underway, as detailed in the BAR.	Site audit observations (26/06/25) and EMPr review	
186	3.33	The listed activity (ies), including site preparation, must not commence within 20 (twenty) calendar days of the date of the notification of the decision being sent to the registered I&APs. In the event that an appeal is lodged with the appeal administrator, the effect of this environmental authorisation is suspended until such time as the appeal is decided.	- The EA was granted on 02/06/23. - CES sent email notification to all registered I&APs on 05/06/23, thus within 3 days of the decision. - Construction commenced on 24/05/24, thus not within 20 days of the date of the notification of the decision being sent to the registered I&APs.	Notification of Environmental Authorisation granted for the Proposed Development of Anglo Borwa Ventilation Shafts, Emulsion Borehole and Overhead line at Mototolo Mine, Limpopo Province, Alex Ndlovu <a.ndlovu@cesnet.co.za> (05/06/23)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
187	3.34	Should there be any conflicting conditions between this EA and other approval granted by other authorities, it is upon the holder of EA to bring it to the attention of the Department for resolution.	This condition is noted by RPM and no conflicting conditions have been raised.	Site interviews (24/06/25)	
4. Management of Activity (ies)					
188	4.1	A copy of the EA and EMPr must be kept at the property or on site office where the activity (ies) will be undertaken. The IEA and EMPr must be produced to any authorised officials of the Department who request to see it and must be made available for inspection by any employee or agent of the holder of the IEA who works or undertakes work at the property (ies).	Electronic copies of the 2022 BAR and associated 2023 EA are available on site.	Site audit interviews (24/06/25)	
189	4.2	The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agent and any other people working on the site, and any updates or amendments to the EMPr must be submitted to the Department for approval.	The BAR and EA conditions were shared with the TCI contractors on site during a Project Meeting in Oct 2024, with the Attendance Register attached to the Environmental Officer's Nov 2024 Internal Compliance Audit.	- Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Nov 2024) - Borwa Vent Shaft Project Meeting Attendance Register (08/10/24)	
190	4.3	Regular monitoring and maintenance of storm water drainage facilities must be conducted at all times, if damaged as directed by the Department or any other relevant authority.	- The Environmental Officer conducts monthly internal compliance audits of the construction project against the conditions of the EA. - There is however no proof of any current or planned maintenance of stormwater infrastructure provided to the auditor.	- Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Jan-May 2025 and Aug-Dec 2024) - Audit information review	
191	4.4	A buffer zone of 100 metres between the activity (ies) and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.	- The final construction drawing (Figure 4) depicts the demarcated closest two unmarked graves (EXIGO-TH374-BP01) and a small cemetery (EXIGOTH374-BP02), located along the access road to the existing Borwa Ventilation Shaft. - These CH sites are 215 m and 400 m away from the closest current construction activities, namely access route 1. - The closest residential area to the Borwa Downcast South Ventilation Shaft is more than 1.5 km to the northwest.	- Mototolo Borwa Ventilation Shaft: Roads & Drainage: Site overview design: General Arrangement, Redco (27/05/24) - Der Brochen-Mototolo Mine Complex - Amended EMPr: Figure 7-9 (Heritage Sites located within the original Mototolo Mine area, Exigo, 2014), SRK (May, 2021)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
192	4.5	The holder of the EA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards.	- Waste on site is temporarily stored in the bins at the dedicated bunded waste management station, prior to being removed off-site to the Borwa salvage yard for sorting and disposal. - Dust suppression is undertaken to prevent nuisance dust. - Annual noise monitoring is undertaken at various locations within the Mototolo Mine Complex and at the closest sensitive receptors. - Monthly air quality monitoring, monthly surface water quality and quarterly groundwater quality and level monitoring are also undertaken by GCS Water and Environment (Pty) Ltd (GCS), surrounding the Borwa Shaft. - Toilets are also regularly maintained by an external contractor to prevent any nuisance conditions or health hazards.	- Anglo American Der Brochen and Mototolo Mine Complex Noise Monitoring Report: Annual Noise Monitoring Report 2024, SLR (07/10/24) - Air Quality Monitoring for Mototolo Mine: Apr 2025 - Monthly Report, GCS (28/05/25) - Water Quality Monitoring Report for Mototolo Mine: December 2024 - Annual Report/Fourth Quarter, GCS (11/02/25)	
193	4.6	The holder of the EA must ensure that all non-recyclable waste are disposed of at waste management facilities licenced to handle such wastes and all recyclable waste are collected by licenced waste management facilities for recycling, reuse or treatment.	- A bunded waste management station with the different domestic waste separation bins is located at Borrow Pit 1. - The waste bins are removed off-site to the Borwa salvage yard for sorting and disposal. - Waste Legends' (<i>Mototolo Mine Complex external waste contractor</i>) monthly waste recon shows separate disposal of domestic and hazardous waste at the applicable licenced facilities.	- Photo 4 - waste management station - Post site audit clarifications - Waste Recon: Mototolo - Borwa, Waste Legends, 2025	
194	4.7	The holder of the EA must ensure that all liquid wastes, whose emissions to water or land could cause pollution are diverted to sewer, after testing water quality and receiving written approval from the relevant local authority.	- There are currently no sewers at the construction site. - Chemical toilets are provided site-wide and are managed by an external contractor.	Site audit observations and interviews (24/06/25)	
195	4.8	Non-compliance with any condition of this EA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31L of NEMA.	This condition is noted by RPM.	Site interviews (24/06/25)	
196	4.9	This EA only authorises activities specified in the EMPr/closure plan and a new authorisation must be applied for in respect of any new activity not specified as part of the EMPr.	This condition is noted by RPM.	Site interviews (24/06/25)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
197	4.10	Only listed activities that are expressly specified in the EMPr that forms part of this EA may be conducted, and additional or new activities not specified herein must be applied for by the holder and authorised by the competent authority in the form of an amendment to the aforesaid EMPr before such activities may be commenced with. This condition is also applicable in the case of the amendment, addition, substitution, correction, and removal or updating of any detail in the aforesaid EMPr.	- Only the listed activities approved in the 2023 EA, for the 2022 BAR and 2023 Addendum to the BAR, have been conducted on site. - This condition is noted by RPM in the event that any additional/new listed activities are required.	Site audit observations and audit information review (24/06/25)	
198	4.11	Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPr.	- The BAR states: 'A method statement must be developed by the project manager or contractor prior to construction, including...site rehabilitation and maintenance considerations. This method statement must be approved by the appointed ECO. 'Regular monitoring of implementation of this method statement for the rehabilitation of disturbed areas must be conducted.' - Rehabilitation was observed on site along the brake test ramp embankment at Borrow Pit 1, as well as the cut-off berm along access road 1, with topsoil spread prior to placement of the Kaytech Enviromat®.	- Photo 17 - cut-off berm along access route 1 with Enviromat® installed - Photo 20 - Enviromat® installed along the brake test ramp embankment	
199	4.12	The Holder of EA must ensure that the name and contact details of the ECO is made available to the Regional Manager within 30 days of commencement. The holder of IEA must also ensure that an ECO is always available on site to ensure that activity (ies) at all times comply with the issued EA and approved EMPr.	- Construction commenced on 24 May 2024. - RPM notified the DMPR of the appointment of the ECO for the construction of the Borwa Ventilation Shafts on 18 July 2024 (<i>thus after the stated 30 day notification period</i>).	Notification and Provision of Information to the Department (SHE/2024/563), RPM (18/07/24)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
200	4.13	- The ECO must: 4.13.1 Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material). 4.13.2 Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid re- occurrence of complaints. 4.13.3 Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials. 4.13.4 Keep copies of all environmental reports submitted to the Department. 4.13.5 Keep the records of all permits, licences and authorisations required by the operation. 4.13.6 Compile a monthly monitoring report and make it available to the Department if requested.	- The ECO keeps electronic copies of: - o incident register (hard copy on site) - o complaint register (hard copy on site) - o environmental monitoring, as well as internal and external audit reports - o all environmental reports submitted to the Department - o all permits, licences and authorisations required - o monthly internal monitoring/compliance inspection reports.	- Mototolo Complex Incidents/Accidents Register - Construction Complaint Register (2024-2025) - Anglo American Der Brochen and Mototolo Mine Complex Noise Monitoring Report: Annual Noise Monitoring Report 2024, SLR (07/10/24) - Air Quality Monitoring for Mototolo Mine: Apr 2025 - Monthly Report, GCS (28/05/25) - Water Quality Monitoring Report for Mototolo Mine: December 2024 - Annual Report/Fourth Quarter, GCS (11/02/25) - Borwa ventilation shafts Internal Compliance Inspection, Lifa Aaron Mangane (Jan-May 2025 and Aug-Dec 2024)	
201	4.14	The duties and responsibility of the ECO should not be seen as exempting the holder of the EA from the legal obligations in terms of the NEMWA and NEMA.	This condition is noted by RPM.	Site interviews (24/06/25)	
202	4.15	The footprint of the activity (ies) must be limited on the areas authorised for the actual construction works and operational activities and all areas outside of the footprint must be regarded as a "no go" areas.	- The footprint was pegged by the Environmental Officer prior to construction commencing. - Borrow material was however incorrectly collected north of the approved Borrow Pit 1 location. A SIB project is currently underway to rehabilitate this area.	- Site audit observations and interviews (24/06/25) - Photo 25 - BAR: Figure 3.24 (Watercourse assessment areas surveyed during the site visit to the study area), CES (Oct, 2022) - with the location where borrow material was incorrectly collected vs the approved Borrow Pit 1 location, indicated	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
203	4.16	Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilizing action such as gabions or re-vegetation must be implemented to prevent further habitat deterioration.	- The TCI method statement describes the gabions, geotextile and reno mattresses installed/being installed at each of the drifts and culvert crossings where the access roads cross the drainage lines, to prevent erosion and capture runoff sediment. - The method statement also states that v-drains are cut through windrows at the road edges, to divert water to the surrounding environment. - Berms have also been constructed at the topsoil stockpiles and a cut-off berm along access route 1.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Photo 13 - gabions, geotextile and reno mattresses at Drift 1 - Photo 14 - gabions, geotextile and reno mattresses at Drift 5 - Photos 15-16 - gabions upgradient and downgradient of the downcast vent shaft terrace	
204	4.17	The holder of the EA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risk involved. Records of training and verification of competence must be kept by the holder EA.	- Hazardous substances are managed on site in line with the Mototolo Mine Complex Hydrocarbon Management Procedure and the TCI Hazardous Chemical Management Procedure. - Proof of training on hazardous substances was provided to the auditor. - Waste Legends are the external contractor responsible for the management of all waste (including hazardous) at the Mototolo Mine Complex.	- Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) - Hazardous Chemical Management Procedure , TCI (TCI/SOP/ENV/011) - Certificate of Achievement: Control Workplace hazardous substances, Willco Safety & Training (Pty) Ltd (29/09/23-29/09/25)	
205	4.18	In order to prevent nuisance conditions, the holder of the EA must ensure that all storage skips and bins are not overfilled.	- None of the bins observed on site were overloaded. - There were no storage skips on site at the time of the audit.	- Photo 4 - waste management station - Site audit observations (26/06/25)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
5. Reporting to the Department					
206	5.1	- The holder of EA must: 5.1.1 submit an Environmental Audit Report to this Department and such report must be done by qualified Environmental Assessment Practitioner and the audit report must specify whether conditions of this environmental authorisation and EMP/closure plan are adhered to; 5.1.2 identify and assess any new impacts and risks as a result of undertaking the activity/ies, if applicable; 5.1.3 identify shortcomings in the EMP/closure plan, if applicable; 5.1.4 identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMP/closure plan; 5.1.5 if applicable, specify that the corrective action/s taken for the previous audit's non-conformities, was adequate; 5.1.6 specify the name of the auditor; and 5.1.7 be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.	- This is the first external compliance audit report for the construction of the Borwa Ventilation Shafts, and includes, in line with Regulation 34 and Appendix 7 of the NEMA EIA Regulations, 2014: - o Section 3: details and expertise of the independent person that compiled the environmental audit report - o Section 5: assessment of compliance with the conditions of this EA - o Section 6: identification of any new impacts and risks, shortcomings in the BAR, the need for any changes to management measures and recommendations on corrective actions. - The submission date of this report can only be audited during the following year's audit, as this is the first external compliance audit for this EA.	Rustenburg Platinum Mines Limited: Mototolo Mine Complex - 2025 Annual Environmental Compliance Audit: Borwa Ventilation Shafts, Emulsion Borehole and Overhead Line (Oct 2022) and Environmental Authorisation (Jun 2023) Reference Number: LP 30/5/1/2/3/2/1 (0182) EM, J9 CC t/a J9Enviro® (Dec 2025)	
207	5.2	Should any shortcomings in terms of Regulation 34(4) be identified, the holder must submit recommendation to amend the EMP/closure plan in order to rectify any shortcomings identified with the aforementioned audit report.	- A SIB project is already currently underway to rehabilitate the area north of Borrow Pit 1 where material was incorrectly collected. - Mitigation and/or management measures have been recommended in Section 6.2 of this audit report, for the remainder of the non-compliances identified. - This condition is noted by RPM.	Site audit observations, interviews, information review and post site audit clarifications (24/06/25)	
208	5.3	Any complaint received from the I&AP during all phases of the operation must be attended to as soon as possible and addressed to the satisfaction of all concerned interested and affected parties.	- A complaint register is kept on site. - No complaints have been received since construction commenced (24/05/24) to date.	- Construction Complaint Register (2024-2025) - Post site audit clarifications	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
209	5.4	The holder of the EA must annually assess the environmental liabilities of the operation by using the master rates in line with the applicable Consumer Price Index (CPI) at the time and address the shortfall on the financial provision submitted in terms of section 24P of NEMA.	- The Mototolo Mine Complex assesses their Closure Liability on an annual basis, with the latest report dated Dec 2024. - The Borwa Shaft and associated Ventilation Shafts (downcast and upcast) are included in the assessment. - Evidence of the submission of the proposed 2024 contributions, submitted to the DMPR, was issued to the auditor for review.	- Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024) - RPM Letter dated December 2024: Mototolo Environmental Rehabilitation Trust: Proposed contributions for the year ending December 2024 - Mototolo Complex LP/5/1/2/3/2/1 (0182) EM (DMPR Date Stamped 03/04/2025) - HSBS Bank plc Letter dated 17 Mar 2025: Performance Guarantee Reference: PEBJOH250194 (DMPR Date Stamped 03/04/2025)	
210	5.5	The holder of the EA must, within 24 hours of incidents occurring, notify the Competent Authority of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.	- The Mototolo Incident Register for 2024-2025 was provided to the auditor and does not include any incidents related to the construction of the Borwa Ventilation Shafts. - This condition is noted by RPM.	Mototolo Complex Environmental Incident Register - 2025	
211	5.6	- The holder of the EA must, within 14 days, or a shorter period of time, if specified by the Competent Authority from the occurrence or detection of any incident referred to in condition 5.5, submit an action plan, which must include a detailed time schedule, and resource allocation signed off by top management, to the satisfaction of the Competent Authority of measures taken to - 5.6.1.1 Correct the impact resulting from the incident; 5.6.1.2 Prevent the incident from causing any further impact; and 5.6.1.3 Prevent a recurrence of a similar incident.	This condition is noted by RPM.	Site interviews (24/06/25)	
212	5.7	In the event that measures have not been implemented within 21 days of the incident referred to in condition 5.6, or measures which have been implemented are inadequate, the Competent Authority may implement the necessary measures at the cost of the holder of the IEA.	This condition is noted by RPM.	Site interviews (24/06/25)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
6. Site Security and Access Control					
213	6.1	The holder of the EA must ensure effective access control on the site to reasonably prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.	- Access to the Mototolo Mine Complex is controlled by RPM Protection services, including fencing, turnstiles and access cards. - Access to the Borwa Downcast South Ventilation Shaft construction site is fenced with a security gate in place, and permanent security.	Photos 26-27 - Borwa Downcast South Ventilation Shaft construction site: access gate and fencing	
214	6.2	Weather proof, durable and legible notices in at least three official languages applicable in the area must be displayed at each entrance to the Site. These notices must prohibit unauthorised entry and state the hours of operation, the name, address and telephone number of the holder of the EA and the person responsible for the operation of the site.	- The TCI method statement states: - o <i>'Signs & Barricading. It shall be ensured that safety signs are erected to warn workers and visitors of specific hazards and to communicate necessary precautionary measures and emergency actions. Barricading controls shall also be implemented and authorised as part of the incident management and emergency response procedures.'</i> - The access gate sign at the Borwa Downcast South Ventilation Shaft construction site: - o is weather proof, durable and legible and prohibits unauthorised entry - o <i>is only in English and does not state the hours of operation, the name, address and telephone number of the holder of the EA or the person responsible for the operation of the site.</i> - The access gate sign at the TCI Site Office: - o is weather proof, durable and legible, prohibits unauthorised entry, includes the names and contact numbers of the RPM and contractor's responsible persons and is in three languages (English, isiZulu and Afrikaans) - o <i>is not in the three official local languages (sePedi, isiZulu and xiTsonga) and does not state the hours of operation, nor the name, address and telephone number of the holder of the EA.</i>	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Photo 8 - Borwa Downcast South Ventilation Shaft construction site access gate sign - Photo 28 - TCI Site Office: access gate sign	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
7. Emergency Preparedness Plan					
215	7.1	- The holder of the EA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and or major accident The plan must, amongst others, include: 7.1.1 Site Fire 7.1.3 Spillage 7.1.3 Natural disasters such as floods 7.1.4 Industrial action 7.1.5 Contact details of police, ambulances and any emergency centre closer to the site.	- The TCI method statement addresses emergencies as follows: - o <i>'Construction Safety Officer. Trains and carries out drills and exercises on how to manage emergency situations. Performs emergency response drills.'</i> - o <i>'Signs & Barricading. It shall be ensured that safety signs are erected to warn workers and visitors of specific hazards and to communicate necessary precautionary measures and emergency actions. Barricading controls shall also be implemented and authorised as part of the incident management and emergency response procedures.'</i> - The Mototolo Mine Complex Emergency Response Management Plan states that: <i>'The SHE Manager and the Review Committee is responsible for the review of this Plan. Such reviews will take place annually or as and when changes are required.'</i> The History of changes shows that reviews were done on 24/01/25 and again on 28/05/25. - The Emergency Response Management Plan addresses: - o Fire Emergency - o Spillages of Tailings from the Transfer System - o Environmental Incidents (including spillage) - o Natural Disasters Emergencies - o Flooding - o Labour Unrest Procedure - o Emergency Telephone Numbers: General, Site Specific and Crisis Management Contact Details.	- Construction of access roads & storm water controls to new ventilation shaft with bulk earthworks, gabion structures & mass concrete works Phase 1, TCI (20/03/24) - Mototolo Complex Emergency Response Plan (MOTC-SHE-EME-MAN-0001)	
216	7.2	The holder of EA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.	No emergency register is currently kept.	Post site audit clarifications	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
8. Investigations					
217	8.1	If, in the opinion of the Competent Authority, nuisances or health risks may be or is occurring on the site, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem.	This condition is noted by RPM.	Site interviews (24/06/25)	
218	8.2	If, in the opinion of the Competent Authority, pollution may be or is occurring, the holder of the EA must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the water quality variables, at those monitoring points and such frequency as may be specified by the Competent Authority.	This condition is noted by RPM.	Site interviews (24/06/25)	
219	8.3	Investigations carried out in terms of conditions 8.1 and 8.2 above must include the monitoring of the relevant environmental pollution, nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Competent Authority	This condition is noted by RPM.	Site interviews (24/06/25)	
220	8.4	Should the investigation carried out as per conditions 8.1 and 8.2 above reveal any unacceptable levels of pollution, the holder of the EA must submit mitigation measures to the satisfaction of the Competent Authority.	This condition is noted by RPM.	Site interviews (24/06/25)	
9. Commissioning and Decommissioning					
221	9.1	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.	The planning phase is complete and the construction phase is currently underway, as detailed in the BAR.	Site audit observations (26/06/25) and EMPr review	
10. Site Closure					
222	10.1	The holder of EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of development.	This condition is noted by RPM.	Site interviews (24/06/25)	
223	10.2	The application for closure indicated above must be submitted together with all relevant documents as indicated in Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended.	This condition is noted by RPM.	Site interviews (24/06/25)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
224	10.3	No exotic plants may be used for rehabilitation purposes only indigenous plant can be utilized for rehabilitation purposes.	- The Agreeco Technical Note describes the surveys undertaken from 10-12 Oct 2023 along the footprints of the proposed ventilation shafts, access roads, powerlines and borrow pits. - Photographic evidence was provided to the auditor of rescue of TOPS, either transplanted directly, or planted in the Mareesburg nursery, as root cuttings, twig cuttings or seeds.	- Technical Note: Assessment of protected plant species in areas earmarked for the development of ventilation shafts and associated infrastructure at the Anglo American Platinum, Mototolo Complex's Borwa Shaft, Agreeco (02/11/23) - Photos 21-24 - rescued and transplanted TOPS, twig cuttings and seeds collected for propagation in the Mareesburg nursery	
225	10.4	The holder of EA remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of extraneous water, compliance with the conditions of EA and the management and sustainable closure thereof until the Minister has issued a Closure Certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002). Where necessary the Minister may retain certain portion of financial provision for residual, health or environmental impacts that might be known in future.	This condition is noted by RPM.	Site interviews (24/06/25)	



#	EA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
11. NEMA Principles					
226	11	- The NEMA Principles (set out in Section 2 of NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), <i>inter alia</i>, provides for: - the effects of decisions on all aspects of the environment to be taken into account; - the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment; - the co-ordination and harmonisation of policies, legislation and actions relating to the environment; - the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and - the selection of the best practicable environmental option.	This condition is noted by RPM.	Site interviews (24/06/25)	
12. Disclaimer					
227	12	The Department of Mineral Resources and Energy in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.	This condition is noted by RPM.	Site interviews (24/06/25)	



6. AUDIT RESULTS AND WAY FORWARD

6.1 AUDIT RESULTS ANALYSIS

The audit results are summarised in **Table 5** and depicted graphically in **Figure 6**.

Table 5: Audit Results Summary

2025 RATING		NO. OF CONDITIONS			% OF TOTAL CONDITIONS
		2022 BAR	2023 EA	TOTAL	
	Compliant	88	52	140	62%
	Non-Compliant	29	8	37	16%
	N/A	10	2	12	5%
	Noted	11	27	38	17%
TOTAL CONDITIONS		138	89	227	100%

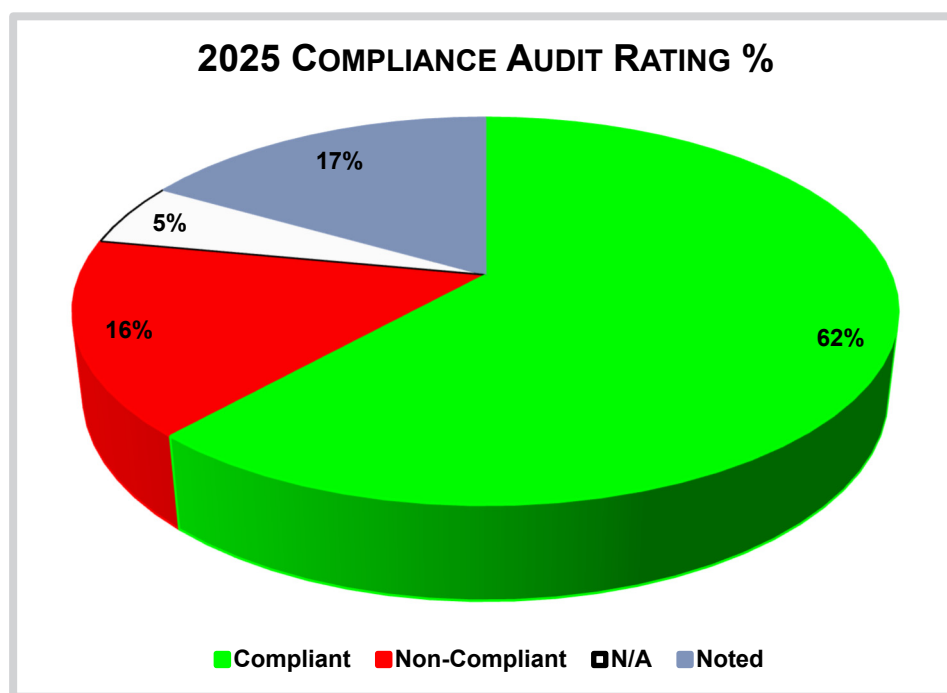


Figure 6: Results of the 2025 EMPr Compliance Audit

The planning and construction phases of the Borwa Ventilation Shafts and associated infrastructure, achieved an overall full compliance level of 62%, measured against the 2022 BAR and associated 2023 EA. 16% of the conditions were non-compliant, 5% not applicable and the remaining 17% noted.



The non-compliances relate to the following environmental aspects:

- » Built Environment:
 - ~ the planning and placement of infrastructure did not avoid sensitive areas, with Borrow Pit 3, access routes 3 and 5, and part of route 1, located in near-natural SMB vegetation, rated as having a high sensitivity; as well as Borrow Pit 1 and part of access route 1 located in the semi-natural SMB, which was assigned a moderate sensitivity, but Condition 20 of the BAR (**Table 2**) however states that: *'The proposed layout of ventilation and emulsion borehole precludes the avoidance / prevention of impacts within high SEI terrestrial areas, because the locations of these shafts are contingent on the operational requirements of the underground mining activities.'*
 - ~ the construction method statement does not address the monitoring and maintenance of stormwater management infrastructure and no Stormwater Management Plan has been developed
 - ~ the signs at the entrances to both the construction site and contractor's office, do not contain all the required information and are not in the three official languages of the local area
- » River and Wetland Impact:
 - ~ the 2024 rerouted initial section of the powerline (**Figure 5**), from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, crosses three drainage lines vs the one crossing in the 2022 BAR powerline alignment (*it appears from **Figure 5** that only the electric cables will cross the drainage lines, with the poles placed outside of the delineated watercourses and a slight adjustment to the northwest, will ensure the cables only cross one drainage line as originally planned*)
- » Terrestrial Biodiversity:
 - ~ infrastructure not currently under construction, such as Borrow Pit 2, were not relocated out of the highly sensitive near-natural SMB vegetation (*the BAR states that if the 'Avoid/prevent' management option was not feasible, the 'Minimize/reduce', 'Remediate/rehabilitate' and 'Offset' conditions required implementation, and none were complied with*)
 - ~ the construction method statement does not address alien vegetation management and no IAP eradication has been conducted at the construction areas
 - ~ borrow material was incorrectly collected north of the approved Borrow Pit 1 location (*Photo 25 of the Photolog*)
 - ~ no biodiversity offset plan has been developed
 - ~ TOPS rescues were conducted during their growing season and not at the ideal time in winter when they would have been dormant
- » Waste Management:
 - ~ the waste storage site does not have a chemical resistant floor and a roof to prevent direct sunlight and rain water from getting in contact with the waste.

6.2 CONCLUSION AND WAY FORWARD

It is the opinion of the auditor and the peer reviewer/auditor, that the 2022 BAR and 2023 Addendum, still complies with the below requirements, as per Appendix 7, Section 3 (1) (e) of the NEMA EIA Regulations, 2014 (as amended) and:

- » (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis;
- » (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility in the case of a closure activity; and
- » (iii) ensure compliance with the provisions of environmental authorisation, EMP, and the closure plan in the case of a closure activity.



The following conclusions apply to the remainder of Section 3 (1) of Appendix 7 of the NEMA EIA Regulations, 2014 (as amended):

- » (f) a description of any assumptions made, and any uncertainties or gaps in knowledge; *it has been assumed that all of the information provided to the auditor during the site visit, site interviews and pre-and post-audit information reviews, were true and correct;*
- » (g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report; *no consultation process was undertaken as part of this compliance audit;*
- » (h) a summary and copies of any comments that were received during any consultation process; *no comments were received as no consultation process was undertaken;* and
- » (i) any other information requested by the competent authority – *no other information requests have been received by the competent authority to date.*

The BAR states that: '*Planning for and placement of infrastructure must be done so as to avoid sensitive areas as far as possible.*' and '*The siting and layout of supporting infrastructure (e.g. access roads and powerlines) must follow existing disturbed corridors (i.e. existing access roads and servitudes) as far as possible to avoid further impact.*' Though borrow material was collected in the incorrect location north of the approved Borrow Pit 1, the 2022 BAR vegetation map (*Photo 1 of the Photolog*) shows this area as having consisted of degraded SMB vegetation (*low environmental sensitivity*), vs the original Borrow Pit 1 being located in semi-natural SMB vegetation (*medium sensitivity*). It is clear from the final construction layout plan (**Figure 4**) that the proposed access roads almost exactly follow the existing prospecting roads. The 2024 powerline route (**Figure 5**) shows that it has been realigned to more closely follow the proposed access roads/existing prospecting roads vs the 2022 alignment.

The optimised layout does, in terms of Regulation 29 of the NEMA EIA Regulations, 2014 (as amended), thus '*...not change the scope of a valid environmental authorisation, nor increase the level or nature of the impact, which impact was initially assessed and considered when application was made for an environmental authorisation*' and there has also **not been** any '*change of ownership or transfer of rights and obligations*'.

The mitigation measures included in the 2022 BAR and 2023 EA are also sufficient in terms of Regulation 34 (4) to manage the environmental impacts associated with the undertaking of the activity, they just require implementation in the areas where gaps were observed, as detailed in **Section 6.1**.

Enacting the following recommendations (*as included in the 2022 BAR and 2023 EA*) for the non-compliances observed, will furthermore ensure that the level of compliance with the provisions of the authorisations, is significantly improved for the duration of the construction phase of the project:

- » update the Construction Method Statement to include IAP Management, Rehabilitation and Stormwater Management
- » develop and implement an IAP Management Plan or include the construction sites of the Borwa ventilation shafts and associated infrastructure, in the existing Mototolo Mine Complex IAP eradication programme by Agreenco (*also display photos of IAPs on site to aid in the identification*)
- » develop and implement a Stormwater Management Plan (including monitoring and maintenance)
- » complete current rehabilitation and revegetation of the borrow area north of Borrow Pit 1
- » the initial section of the powerline, from where it originates west of Borwa Shaft and runs south-southwest to the access road west of Borrow Pit 1, falls outside of the Agreenco TOPS surveys conducted for the 2022 BAR and will require surveys and TOPS rescues prior to construction
- » plan any remaining TOPS rescues during winter (June to August), to coincide with the ideal time to transplant most plant species while they are dormant (and to ensure a higher rate of success of survival and propagation)
- » develop a biodiversity offset plan, based on the loss of Critical Biodiversity Areas (CBA) 1 and 2 and Ecological Support Areas (ESA) 1



- » repair erosion gullies on the topsoil stockpiles and monitor and prevent/rehabilitate all signs of erosion at the construction areas
- » during the remaining construction activities, the ECO should walk ahead of clearing construction machinery and move slow moving faunal species
- » consider further realignment of the powerline route to cross less drainage lines and disturb less sensitive vegetation types
- » ensure soil stockpiles remain below 1.5 m in height and are protected from erosion (*wind and water*) and IAP
- » consider treating all waste storage floors and bunded areas with a chemical resistant and impermeable paint or material, and ensure all bins and skips have lids
- » ensure an Emergency Register is kept on site
- » update the signs at the entrances to contain all required information and ensure they are in at least the three official languages of the local area (*sePedi, isiZulu and xiTsonga, followed by English and Afrikaans*).



ANNEX 1: Photolog of Evidence



Photo 1: Sekhukhune Mountain Bushveld (SMB) vegetation types (CES, 2022)



Photo 2: Route 1 - Heritage site sign (English)



Photo 3: Route 1 - Heritage site sign (sePedi)



Photo 4: Borrow Pit 1 - Waste Management Station

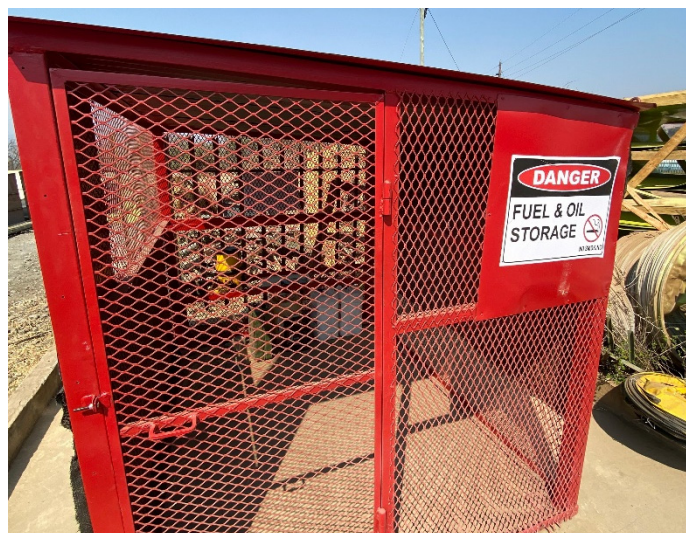


Photo 5: Chemical cage in concrete bunded area



Photo 6: Concrete bunded area for equipment



Photo 7: Borwa Downcast South Vent Shaft construction site - fire extinguisher



Photo 8: Borwa Downcast South Vent Shaft construction site - access gate sign



Photo 9: Borrow Pit 1 - soil stockpiles



Photo 10: Borrow Pit 1 - erosion gullies along the stockpiles



Photo 11: Borrow Pit 1 - construction aggregate



Photo 12: Borrow Pit 3 - soil stockpiles



Photo 13: Drift 1 - gabions, geotextile and reno mattresses



Photo 14: Drift 5 - gabions, geotextile and reno mattresses



Photo 15: Borwa Downcast South Vent Shaft construction site - upgradient gabions



Photo 16: Borwa Downcast South Vent Shaft construction site - downgradient gabions



Photo 17: Access route 1 - cut-off berm with Enviromat® installed as part of rehabilitation



Photo 18: Borrow Pit 1 - berms at the topsoil stockpiles



Photo 19: Chemical toilets on site



Photo 20: Borrow Pit 1 - Enviromat® along the brake test ramp as part of ongoing rehabilitation



Photo 21: Protected trees rescued and directly transplanted from the development footprints



Photo 22: Aftercare of protected trees rescued and directly transplanted



Photo 23: Protected Marula tree twig cuttings planted in the Maresburg Nursery



Photo 24: Protected Sekhukhune Elephant-root seeds propagated at the Maresburg Nursery

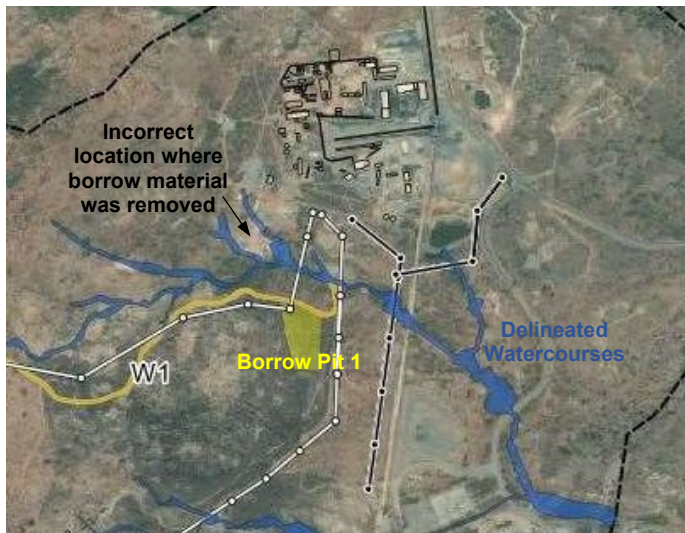


Photo 25: Delineated watercourses (CES, 2022) - Borrow pit 1 vs incorrect material collection area

Photo 26: Borwa Downcast South Vent Shaft construction site - access gate



Photo 27: Borwa Downcast South Vent Shaft construction site - fencing and PPE worn

Photo 28: TCI Site Office - access gate sign