

AGGREGATE / GRAVEL MINE ON PORTION 7 OF THE FARM ROODEKRANS 457

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT



REFERENCE NUMBER:	MP 30/5/1/3/2/10893 MP
AUDIT PERIOD:	NOVEMBER 2025

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Prepared For:

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PROJECT DETAIL:

Permit Number:	MP 30/5/1/3/2/10893 MP	Date of Commencement:	June 2024
Site Name:	Roodekrans Quarry	Inspection Date:	11 November 2025
Contractor:	B&E International (Pty) Ltd	Report Number:	03
Environmental Control Officer:	Zoë Norval	Other Authorisations:	None

DETAIL OF AUDITOR (APPENDIX 7 SUB-REGULATION 3(A) & (B)):

ECO:	Zoë Norval
EXPERTISE:	Ms Z. Norval has a Bsc degree in Environmental Science and an Honours degree in Botany. In her Honours year, she focused mainly on environmental assessments and geographic information systems. Her expertise comprises a range of assisting senior consultants with environmental services, Environmental Control and Environmental Performance Assessments / Compliance Audits, preparation of environmental related documentation, Mining Right and Permit applications and applications for Environmental Authorisations
DECLARATION OF INDEPENDENCE:	<p>I, Zoë Norval, in my capacity as environmental control officer declare that–</p> <ul style="list-style-type: none"> • I act as independent environmental control officer in this compliance audit; • I will perform the work relating to the audit in an objective manner, even if the results and findings are not favourable to the holder of the authorisation; • I have expertise in conducting environmental compliance audits, including knowledge of the Act and regulations that have relevance to the activity; • I will adhere to and comply with all responsibilities as indicated in the National Environmental Management Act and Environmental Impact Assessment Regulations. • I do not have and will not have any vested interest in the activity other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014. <div style="text-align: center;">  </div> <div style="display: flex; justify-content: space-between;"> Zoë Norval Date: 19 November 2025 </div>

SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT (APPENDIX 7 SUB-REGULATION 3(C)):

This environmental audit report was compiled in terms of the requirements of the NEMA EIA Regulations, 2014, (as amended).

OBJECTIVE:

The objective of the environmental audit report (EAR) is to evaluate compliance of the operational activities in terms of the environmental management programme (EMPR) and mining permit.

INSPECTED AREAS:

The inspection included an assessment of the following areas:

- Quarry area
- Overburden and topsoil stockpiles;
- Material Stockpiles;
- Processing area;
- Workshop area; and
- Office area.

In order to establish the environmental compliance assessment of the operation, the mining site was inspected by the Environmental Control Officer, Sonette Smit from Greenmined Environmental.

ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE (APPENDIX 7 SUB-REGULATION 3(F)):

The assumptions made in this document, stem from specific information gathered during the site audit and background information gathered from the mining permit holder.

LOCATION:

Site Location:	The site is situated approximately 1.7 km West of the R35 turnoff 5 km Northwest of Morgenzon on the Hendrikspan secondary road.
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PROJECT DESCRIPTION:

B&E International (Pty) Ltd holds a Mining Permit (10893 MP) over 4.9 ha on a portion of Portion 7 of the Farm Roodekrans 457 IS, Magisterial District of Bethal, Mpumalanga Province. DMPR issued the mining permit (10893 MP) for the 4.9 ha area in 2021.

SITE CONDITIONS:

Cloudy and cool



REPORTABLE ENVIRONMENTAL INCIDENTS:

None at this stage.

ADOPTED METHODOLOGY (APPENDIX 7 SUB-REGULATION 3(D)):

COMPLIANCE SCORE	DESCRIPTION
1	Task not achieved
2	Task 20% achieved
3	Task 50% achieved
4	Task 80% achieved
5	Task 100% achieved in accordance with the EMP

NON-COMPLIANCE SCORE	DESCRIPTION
1	LOW – Mitigation not needed / mitigation measures to be maintained
2	MEDIUM – Mitigation should be considered
3	HIGH – Mitigation compulsory

INSPECTION ASPECTS:

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
LEGISLATION COMPLIANCE:				
Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)	5	-	Compliant	Approved mining permit and third renewal application approved and expires on 31 October 2026.
Mining Permit available on site	5	-	Compliant	-
National Water Act, (Act No. 36 of 1998)	5	-	Compliant	There is an existing GA regarding the water usage of the quarry pit.
National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2010	5	-	Compliant	DMPR deems the approved EMPR and MP of the quarry compatible with an Environmental Authorisation in terms of NEMA, 1998.
Environmental Conservation Act, 1989 (Act 73 of 1989)	5	-	Compliant	-
Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)	5	-	Compliant	-
Copy of the EA and EMPR available on site	5	-	Compliant	EA and EMPR is available in the site file.
National Heritage Resources Act No 25 of 1999	5	-	Compliant	-
National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)	N/A	-	N/A	The operations at the quarry does not trigger the NEM:AQA, 2004.
National Veld and Forest Fires Act, 1998 (Act No. 101 of 1998)	5	-	Compliant	-
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	3	3	To be addressed	Although the operation does not require a waste management licence, overall waste management practices need significant improvement due to the presence of scattered litter and hydrocarbon-contaminated areas observed on site.
Occupational Health and Safety Act. 1993 (Act No.85 of 1993)	5	-	Compliant	-
Hazardous Substances Act, 1973 (Act 15 of 1973)	1	3	Non-compliant	Evidence of oil spills and drip trays filled with accumulated hydrocarbons indicates poor hydrocarbon management. Spills must be cleaned immediately and spill kits made

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
				readily accessible. Staff require refresher training on spill response.
ASPECTS OF THE AFFECTED ENVIRONMENT				
TOPSOIL MANAGEMENT				
Topsoil must be stripped and stored at a demarcated and signposted stockpile area within the mining permit area. Stockpiling of topsoil must be done to protect it from erosion, mixing with overburden or other material. The topsoil must be used to cover the rehabilitated area and improve the establishment of natural vegetation.	1	3	Non-compliant	The undesignated topsoil shows signs of compaction, weed infestation, low organic content, and poor structure, indicating disturbance from mining activities and the need for remediation before effective rehabilitation can take place. Please see photo report
The temporary topsoil stockpiles of each removed strip should be kept free of weeds.	1	3	Non-compliant	Visible infestation of weeds and invader species. The weed control plan must be immediately implemented. Routine removal and herbicide treatment (where permitted) required.
Topsoil stockpiles should be placed on a levelled area and measures should be implemented to safeguard the piles from being washed away or blown away.	5	-	Compliant	-
Storm- and runoff water should be diverted around the stockpile area and access roads to prevent erosion.	5	-	Compliant	-
FAUNA AND FLORA				
A weed and invader plant control management plan must be implemented at the site to ensure eradication of all listed invader plants in terms of Conservation of Agricultural Act (Act No 43 1983).	1	3	Non-compliant	As above.
The site manager should ensure that no fauna is caught, killed, harmed, sold or played with.	5	-	Compliant	-
Workers should be instructed to report any animals that may be trapped in the working area.	5	-	Compliant	-
No snares may be set or nests raided for eggs or young.	5	-	Compliant	-
No plants or trees may be removed without the approval of the ECO.	5	-	Compliant	-

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
AIR QUALITY AND NOISE				
The liberation of dust into the surrounding environment must be effectively controlled by the use of, inter alia, water spraying and/or other dust-allaying agents.	5	-	Compliant	-
The site manager must ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.	5	-	Compliant	-
Speed on the access roads must be limited to 40km/h to prevent the generation of excess dust.	5	-	Compliant	-
The applicant must ensure that employees and staff conduct themselves in an acceptable manner while on site.	5	-	Compliant	-
All mining vehicles must be equipped with silencers and maintained in a road worthy condition in terms of the Road Transport Act.	5	-	Compliant	-
SURFACE AND STORM WATER MANAGEMENT				
Storm water must be diverted around the topsoil heaps, stockpile areas and access roads to prevent erosion and loss of material via trenches and contour structures.	5	-	Compliant	-
Surface slope maintained to ensure that excavation is freely drained and prevents ponding of water on the surface.	5	-	Compliant	-
Runoff water must also be diverted around the stockpile areas with trenches and contour structures to prevent erosion of the work areas.	5	-	Compliant	-
All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed.	5	-	Compliant	-
Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition.	5	-	Compliant	-
Clean water (e.g. rainwater) must be kept clean and be routed to a natural watercourse by a system separate from the dirty water system. You must prevent clean water from running or spilling into dirty water systems.	5	-	Compliant	-

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Dirty water must be prevented from spilling or seeping into clean water systems.	5	-	Compliant	-
VISUAL EXPOSURE (FBAR PG NO 133)				
The site needs to have a neat appearance and be kept in good condition at all times.	1	3	Non-compliant	The site's housekeeping is inadequate, with scattered litter, poorly maintained operational areas, and visible hydrocarbon spills indicating a need for immediate clean-up and stricter ongoing housekeeping controls.
Upon closure, the site needs to be rehabilitated and sloped to insure that the visual impact on the aesthetic value of the area is kept to a minimum.	N/A	-	N/A	Not yet applicable
All mining activities must take place within the boundaries of the site.	5	-	Compliant	-
MINING ACTIVITIES				
MANAGEMENT OF FUEL AND HYDROCARBON PRODUCT				
Hazardous material stored within a bunded area	1	3	Non-compliant	Oil containers and drips trays not stored within a bunded area. Please see photo report.
Management of fuel and oil spills	1	3	Non-compliant	The mobile diesel tank has visible oil leaks at the fuel pump area, indicating poor refuelling practices that must be urgently improved to prevent further contamination.
Drip trays present when refuelling is done outside the service bay	1	3	Non-compliant	Although drip trays are in place, oil leakage is still evident around them, indicating that the trays are not being used effectively or are not adequately maintained.
Drip trays placed underneath stationary vehicles/ mining equipment.	3	3	Partially compliant	
WASTE MANAGEMENT				
No processing area or waste pile may be established within 100m of the edge of any river channel or other water bodies.	5	-	Compliant	-

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Any vehicle repairs may only take place within the service bay area (bund area) and all waste products must be disposed of in a 200 litre closed container/bin found inside the emergency service area.	5	-	Compliant	-
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.	1	3	Non-compliant	As above
Any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognised facility.	1	3	Non-compliant	As above.
Spills must be cleaned up immediately by removing the spillage together with the polluted soil and by disposing of them at a recognised facility.	1	3	Non-compliant	As above.
An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillage etc) that occur on site must be developed.	5	-	Compliant	-
Suitable covered receptacles must be available at all times and conveniently placed for the disposal of waste.	5	-	Compliant	-
Non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., must be stored in an animal-proof container with a closable lid at a collecting point and collected on a regular basis and disposed of at a recognised landfill site.	3	3	Partially compliant	Waste bins are provided but the site is still scattered with litter.
No waste must be disposed of through burying, burning, dumped or deposited on the adjacent properties or public places and open spaces.	5	-	Compliant	-
POTABLE WATER AND ABLUTION FACILITIES				
Ablution facilities available on site more than 200m from a watercourse	5	-	Compliant	-
Potable water available on site for use of workers	5	-	Compliant	-
FIRE MANAGEMENT				

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Fire-fighting equipment that are in good working conditions must be available at all times for the their usage during the occurrence of accidental fires.	5	-	Compliant	-
No open fires at mining site allowed	5	-	Compliant	-
Workers must be adequately trained in the handling of firefighting equipment	5	-	Compliant	-
Smoking must be prohibited in the vicinity of flammable substances.	5	-	Compliant	-
Cooking and heating fires must be permitted only in designated areas with appropriate safety measures.	5	-	Compliant	-
MINING ACTIVITY/ EQUIPMENT MANAGEMENT				
All mining earth-moving equipment & vehicles operating within site boundaries preventing crisscrossing	5	-	Compliant	-
All mining/construction equipment's and vehicles must be cleaned before entering and leaving the site to reduce the chances of spreading weeds and invasive species.	4	1	NOT FEASIBLE	This requirement is not considered feasible for the site, as the continuous cleaning of all mining and construction vehicles upon entry and exit would result in operational delays and is not practical for the current project setup. Instead, site management will continue to monitor and manage weed and invasive species growth through routine vegetation control measures, ensuring that the risk of spreading unwanted species is effectively minimised through alternative, achievable methods.
Visible semi-permanent markers placed on the mining boundary	5	-	Compliant	-
Mining equipment mechanically sound without visible oil leaks and a decrease in smoke discharge	3	3	Partially compliant	As above
Vehicle repairs only conducted in service bay area, and waste products disposed of in containers/bins	5	-	Compliant	-
No excavation to occur below the level of the water table	5	-	Compliant	-
EMPLOYEE AND SAFETY MANAGEMENT				

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Workers should have access to the correct personal protection equipment (PPE) as required by law.	5	-	Compliant	-
All operations should comply with the Occupational Health and Safety Act.	5	-	Compliant	-
Workers inducted and informed of EMP conditions	5	-	Compliant	-
No camping allowed on the mining area	5	-	Compliant	-
Are there signs present, indicating the mining site about the hazard around the construction site and heavy vehicles and speed restrictions	5	-	Compliant	Please see photo report.
SITE SECURITY AND ACCESS CONTROL				
Effective access control to the site to reasonably prevent unauthorised entry such as lockable gates and mining area fenced off. Signs indicating the risks involved in unauthorised entry must be displayed at the entrance	5	-	Compliant	-
Newly constructed access roads (if applicable) must be adequately maintained so as to minimise dust, erosion or undue surface damage.	5	-	Compliant	-
Necessary signage and traffic measures must be implemented for safe and convenient access to the site from the adjacent roads.	5	-	Compliant	-
Storm water diverted around the access roads to prevent erosion.	5	-	Compliant	-
Vehicular movement restricted to existing access routes to prevent crisscrossing of tracks through undisturbed areas.	5	-	Compliant	-
Rutting and erosion of the access road caused as a result of the mining activities is repaired by the applicant.	5	-	Compliant	-
Weatherproof, durable and legible notices in at least three official languages applicable in the area must be displayed at the entrance to the site. These notices must include: <ul style="list-style-type: none"> Hours of the operation Name Address Telephone number of the EA holder and site manager 	5	-	Compliant	-
EMERGENCY RESPONSE PLAN				

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
<p>Maintain and implement an emergency response plan with an annual review during the audit period and after major emergency and or major accident. The plan must, amongst others, include:</p> <ul style="list-style-type: none"> • Site fire • Spillage • Natural disasters (floods) • Industrial action • Contact details of police, ambulances and any emergency centre closer to the site 	5	-	Compliant	-
Emergency register available on site	5	-	Compliant	-
All significant pollution incidents must be recorded and reported to Department of Mineral and Petroleum Resources within forty (48) hours of occurrences.	5	-	Compliant	-

COMMENTS / COMPLAINTS RECEIVED FROM I&AP'S:

No comments / complaints have been received by site management.

RESULT OF ASSESSMENT (REGULATION 55(3)(f):

Compliance of the mining site with the EMPR was reviewed during the site assessment. The mining area recorded a compliance score of 86% for November 2025 audit period.

The environmental compliance assessment undertaken for the quarry operation indicates that, although the site remains compliant with most statutory provisions and EMPr requirements, several areas of non-compliance were recorded which require urgent corrective action. The operation continues to function under valid approvals, including the Environmental Authorisation, the EMPr, and the General Authorisation for water use. However, notable shortcomings were identified in relation to the National Environmental Management: Waste Act, the Hazardous Substances Act, and several specific conditions of the EMPr, which contributed to a reduced overall compliance score.

A concerning overarching observation from the assessment is that most of the recorded non-compliances were concentrated in areas directly adjacent to the site offices and within spaces routinely accessed by management. These issues, highly visible and encountered daily, have not been addressed, indicating a lack of prioritisation of environmental responsibilities at an operational level. The persistent neglect of basic environmental housekeeping and compliance measures in the immediate management zone raises serious concerns about the site's environmental culture and the extent to which accountable oversight is being exercised.

Hydrocarbon and Hazardous Substances Management

Significant issues were observed regarding hydrocarbon and hazardous substances management. Oil spills and hydrocarbon-contaminated soil were evident in multiple locations, and several drip trays were either overflowing or inadequately maintained. The mobile diesel tank displayed signs of leakage at the refuelling point, indicating poor refuelling practices, while hazardous materials were stored outside a suitably bunded area. These findings highlight a systemic failure in managing hydrocarbon risks effectively and demonstrate the need for improved spill response readiness and training.

Waste Management Performance

Waste management practices also require substantial improvement. Although receptacles are available on site, general housekeeping has declined, with scattered litter visible around operational areas. Waste separation is not being consistently implemented, resulting in mixed waste accumulating in certain zones.

Improper handling and disposal of hydrocarbon-contaminated materials further underscores the need for improved oversight and adherence to legal waste management standards.

Topsoil Handling and Rehabilitation Readiness

Topsoil management practices were found to be non-compliant. The stockpiles were neither demarcated nor properly maintained and displayed signs of compaction, low organic content and extensive weed infestation. The invasive plant management plan has not been effectively implemented, evidenced by widespread presence of invader species across disturbed areas and stockpiles. This poses a significant risk to future rehabilitation success and demands immediate remedial action.

Site Housekeeping and Visual Condition

The overall visual condition of the site is below the expected standard. Scattered waste, oil-stained surfaces and poorly organised operational areas have contributed to an untidy impression, indicating insufficient housekeeping and inconsistent application of environmental management practices. These issues also extend into the workshop and equipment areas, where machinery servicing has resulted in minor oil leaks and where drip trays, although present, have not been effectively used. Housekeeping in the workshop remains inadequate and increases the risk of pollution.

Workshop, Machinery and Equipment Management

Machinery servicing and general equipment management practices require improvement. Some machinery exhibited leaks and poor mechanical maintenance, contributing to soil contamination. Drip trays were present but not used effectively, while housekeeping in the workshop area was below acceptable standards. Collectively, these issues increase the risk of pollution and indicate a need for improved operational controls and staff accountability.

Overall, while the site continues to operate under valid environmental authorisations, its environmental performance is currently hindered by recurring issues linked to hydrocarbons, waste management, topsoil care, and invasive vegetation control. Immediate corrective action is required to bring the operation back into full compliance and to ensure effective environmental protection during ongoing mining activities.

MATTERS TO BE ADDRESSED ON SITE:

- Hydrocarbon spills, leaks and contaminated soil must be cleaned and prevented through proper storage, bunding and effective drip tray use.
- Waste management practices must be improved, including waste separation, housekeeping, and correct disposal of contaminated materials.
- Topsoil stockpiles must be demarcated, rehabilitated and kept free of weeds and invasive species.
- The invasive and weed species management plan must be implemented immediately across the site.

- Site housekeeping must be improved to address scattered litter, poor visual condition and general disorganisation.
- Machinery and workshop practices must be improved, including repairing oil leaks and maintaining proper pollution control.

ABILITY OF EMPR TO ADEQUATELY MANAGE OR MITIGATE ENVIRONMENTAL IMPACTS (APPENDIX 7 SUB-REGULATION 3(E):

The EMPR does have the ability to adequately manage and mitigate the environmental impacts on the activities on site.

NEED FOR AMENDMENT OF THE EMPR:

Not at this stage.

FINANCIAL PROVISION

The initial quantum calculation compiled for Roodekrans Quarry was in 2016 by Greenmined Environmental (Pty) Ltd and the financial provision amount came to R 1 199 063.13 for which amount a financial guarantee was lodged with the DMPR. This report is accompanied by a new financial provision calculation for the year 2025 that amounts to R 99,899.44 which does not surpass the current guarantee in place.

ECO SIGNATURE:

NAME:	SIGNATURE:	DATE:
Zoë Norval		19 November 2025

PHOTOGRAPHS:





EXCAVATION AND PROCESSING AREA



DANGER SIGNAGE



TOOLS & OIL CONTAINERS WITHIN DRIP TRAYS



STOCKPILES



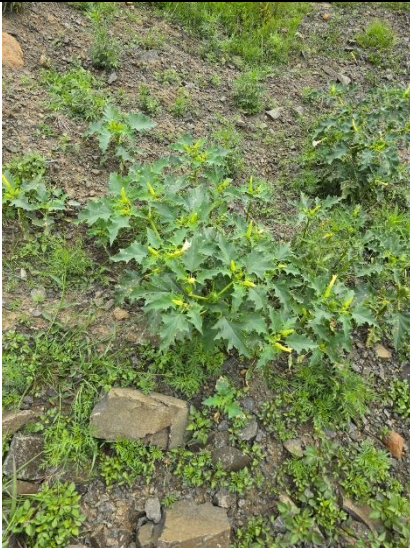
COMPACTED TOPSOIL



OVERBURDEN



VARIOUS WEEDS TO BE ERADICATED



	
	
	
<p>PARKING BAYS</p>	<p>WATER PUMP</p>



GENERATOR WITH OIL LEAK (TO BE REMOVED)



ABULUTION FACILITIES



JOJO TANK & POTABLE WATER

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WATER BOWSER



USED OIL NOT STORED WITHIN BUNDED AREA



OIL TANK WITH OIL LEAKS



OFFICE AREA, WORKSHOP AREA & SCRAP YARD

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LITTER TO BE REMOVED



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WASTE MANAGEMENT



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OIL SPILLS



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