

**MINING ON PORTION 0 AND PORTION 1 (REMAINING
EXTENT) OF THE FARM DE KLERKS KRAAL NO 231,
THEUNISSEN DISTRICT
FREE STATE PROVINCE**

**ENVIRONMENTAL PERFORMANCE ASSESSMENT /
ENVIRONMENTAL AUDIT REPORT**

DMPR REFERENCE NUMBER	FS 30/5/1/2/2/10071 MR
AUDIT PERIOD	JUNE 2025 – JUNE 2026

Prepared For:

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1. PROJECT SPECIFIC DETAIL

ITEM	MINING RIGHT HOLDER
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ITEM	LOCATION AND AREA INFORMATION
Site Name	De Klerks Kraal Sand Mine
Property Description	❖ Portion 0 of the farm De Klerks Kraal No 231 ❖ Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231
Location	The De Klerks Kraal Sand Mine is ±35 km north of Theunissen and ±25 km south of Welkom in the Free State Province
Size of Mining Area	238.5426 ha



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

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2. ENVIRONMENTAL AUDIT REPORT

PROJECT DETAIL

Right Number:	FS 30/5/1/2/2/10071 MR	Date of Commencement:	June 2023
Site Name:	De Klerks Kraal Sand Mine	Inspection Date:	25 June 2026
Right Holder:	Vengablox (Pty) Ltd	Other Authorisations:	Water Use Licence: 27/2/1C1142/101; WU22656
Report Number:	EPA 03		

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

ECO:	Christine Fouché
EXPERTISE:	Ms Fouche has a Diploma in Nature Conservation and a BSc in Botany and Zoology with twenty-one years experience in doing environmental impact assessments and compliance monitoring in South Africa.
DECLARATION OF INDEPENDENCE:	I Christine Fouche declare that – • 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 (as amended). <i>Christine Fouché</i> Signature of ECO Date: 30 June 2026

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

This environmental performance assessment (EPA) / environmental audit report (hereafter referred to as the EPA) was compiled in terms of the requirements of the NEMA EIA Regulations, 2014 (as amended).

OBJECTIVE

The objective of the audit is to evaluate compliance of the operational activities with the environmental management programme (EMPR) and Environmental Authorisation (EA) issued by the DMPR for the site.

INSPECTED AREAS

The inspection included an assessment of the following areas:

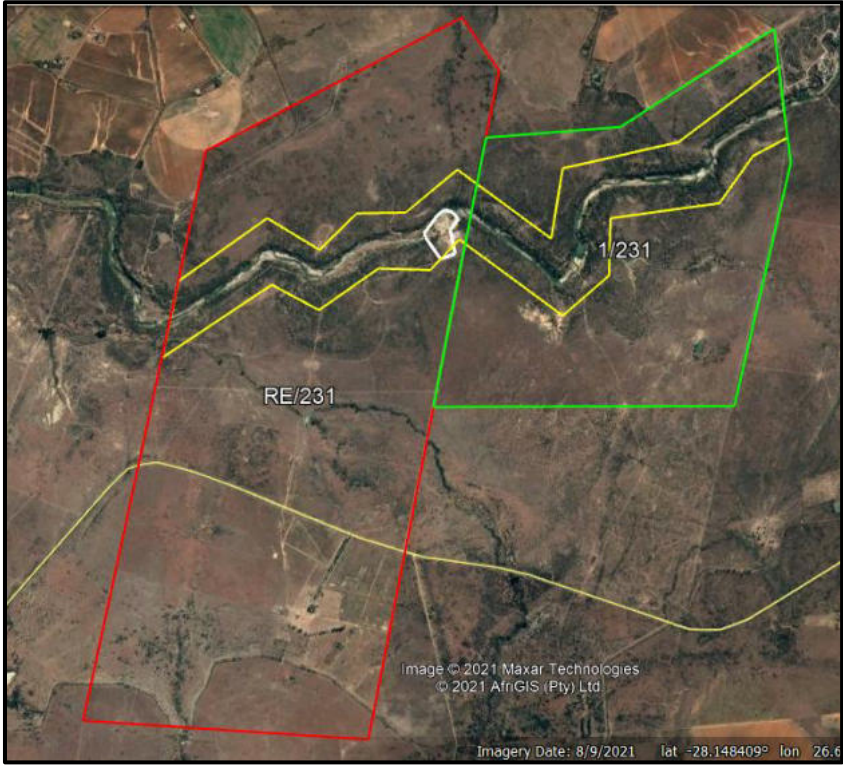
- » Excavations;
- » Diesel store and bund;
- » Office and storage areas;
- » Parking area;
- » Settling pond / historic excavation;
- » Stockpile area;
- » Washing and screening plant area; and
- » Waste storage area.

To establish the environmental compliance assessment of the operation, the mining site was inspected on foot by the Environmental Control Officer, Christine Fouche of Greenmined accompanied by site management.

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 provided by site management. The findings of the previous environmental performance assessment (2025) were also considered. This audit did not consider health and safety aspects, was not intended as a legal assessment, nor was the aspects of the Social and Labour Plan and/or Mine Works Programme reviewed.

LOCATION

Site Location:	The De Klerks Kraal Sand Mine is ±35 km north of Theunissen and ±25 km south of Welkom in the Free State Province	
Site Map:		
Site Coordinates:	A	28°08'30.08" S; 26°39'05.39" E
	B	28°08'15.33" S; 26°39'28.64" E
	C	28°08'22.60" S; 26°39'42.58" E
	D	28°08'14.18" S; 26°39'52.30" E
	E	28°08'13.90" S; 26°40'05.35" E
	F	28°08'03.78" S; 26°40'19.05" E
	G	28°08'20.02" S; 26°40'43.87" E
	H	28°08'03.36" S; 26°40'46.99" E
	J	28°07'57.21" S; 26°41'17.71" E
	K	28°07'39.27" S; 26°41'44.66" E
	L	28°07'56.16" S; 26°41'46.76" E
	M	28°08'00.53" S; 26°41'37.49" E
	N	28°08'11.85" S; 26°41'28.46" E
	P	28°08'15.33" S; 26°40'59.56" E
	Q	28°08'28.76" S; 26°40'59.15" E
	R	28°08'38.27" S; 26°40'46.86" E
	S	28°08'20.29" S; 26°40'19.55" E
	T	28°08'27.50" S; 26°40'11.92" E
	U	28°08'27.19" S; 26°39'58.16" E
	V	28°08'36.86" S; 26°39'42.70" E
	W	28°08'30.96" S; 26°39'30.11" E
	X	28°08'48.06" S; 26°39'01.46" E

PROJECT DESCRIPTION

Vengablox (Pty) Ltd holds a Mining Right over ±239 ha comprising Portion 0 and Portion 1 (Remaining Extent) of the Farm De Klerks Kraal No. 231. The operation involves the extraction of sand from both the Sand River channel and the adjacent riverbanks.

The current operational disturbance footprint is approximately 5.3 ha, which remains below the 6.5 ha disturbance area authorised in the approved Environmental Impact Assessment Report (EIAR) and Environmental Management Programme (EMPr).

Sand extraction within the river channel is undertaken by hydraulic mining, whereby sand is pumped directly from the riverbed to the processing plant's cyclone system. This process bypasses the settling ponds. Process water generated during beneficiation has since the site inspection been directed into the central excavation for recirculation and reuse within the operation (where possible). Alternatively, the water is released back into the river following the settling of the sediment in the excavation.

Sand deposits located on the riverbanks are extracted through conventional open-cast methods using excavators. The mined material is loaded directly onto haul trucks and transported to the on-site screening and washing plant for processing. Following beneficiation, the sand is stockpiled on-site pending sale and transportation to customers.

SITE CONDITIONS

Sunny windless day with wet soil conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date:	N/A
Incident No:	N/A
Incident:	The mine has an incident register that keeps track of incidents. No major incidents occurred during the audit period that had to be reported to the DMPR.
How addressed:	N/A
When addressed:	N/A

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



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

INSPECTION ASPECTS

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
LEGISLATION COMPLIANCE				
National Environmental Management Act, 1998 (Act No 107 of 1998) and the Environmental Impact Assessment Regulations, 2014	5	-	Compliant	-
Copy of the EA and EMPR available on site	5	-	Compliant	-
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002)	5	-	Compliant	-
Mining right available on site	5	-	Compliant	-
Mine plan annually reviewed	5	-	Compliant	The Mine Plan was renewed in June 2026.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	5	-	Compliant	-
National Water Act, 1998 (Act 36 of 1998)	N/A	-	-	The WUL conditions are audited separately to determine compliance.
Water Use Licence on site	5	-	Compliant	-
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	4	3	Ongoing	The problem plants are constantly removed from the work areas.
National Heritage Resources Act, 1999 (Act No 25 of 1999)	N/A	-	-	Not applicable as no heritage artefacts/remains were discovered to date.
Mine Works Programme available	5	-	Compliant	-
Social Labour Plan available	5	-	Compliant	-
Copies of Financial Provision Calculation (FP) and Annual Performance Audit (EPA) present	5	-	Compliant	The 2025 EPA and FP are available on site.
Waste register and permits for waste removal	5	-	Compliant	-
Complaints Register Present	5	-	Compliant	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Environmental Awareness training	5	-	Compliant	Proof of environmental training is available on site.
ASPECTS OF THE AFFECTED ENVIRONMENT				
Topography				
Implement progressive rehabilitation as prescribed in the closure plan, appended to the EMPR, through-out the operational- and decommissioning phases of the project.	5	-	Compliant	The use of the eastern excavation as settling ponds contribute to the progressive rehabilitation of the pit by allowing sediment to gradually accumulate and refill the void.
Visual Characteristics				
Do not exceed the proposed 6.5 ha (two 2.5 ha minor areas, and 1.5 ha for processing) operational areas at any given time.	5	-	Compliant	Presently the impact footprint is ±5.3 ha.
Ensure that the site have a neat appearance and is always kept in good condition.	5	-	Compliant	-
Store mining equipment neatly in a dedicated area with a sealed drip tray underneath when not in use.	5	-	Compliant	On the day of the audit the parking area of the mine was neat, and drip trays were in use.
Implement concurrent rehabilitation as mining progress to limit the visual impact on the aesthetic value of the area.	5	-	Compliant	-
Limit vegetation removal, and only strip topsoil immediately prior to the mining/use of a specific area.	5	-	Compliant	-
Rehabilitate and level the site upon closure to ensure that the visual impact on the aesthetic value of the area is kept to a minimum.	N/A	-	-	Not yet applicable.
Air Quality and Noise Ambiance: Dust				
Control the liberation of dust into the surrounding environment using; inter alia, water spraying and/or other dust-allaying agents.	5	-	Compliant	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.	5	-	Compliant	-
Limit speed on the access roads to 40 km/h to prevent the generation of excess dust.	5	-	Compliant	-
Minimise areas devoid of vegetation and only remove vegetation immediately prior to mining.	5	-	Compliant	-
Flatten loads to prevent spillage and windblown dust during transportation.	5	-	Compliant	-
Consider weather conditions upon commencement of daily operations. Limit operations during very windy periods.	5	-	Compliant	-
Ensure dust-generating activities comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM:AQA, 2004 and ASTM D1739 (SANS 1137:2012).	5	-	Compliant	Greenmined monthly monitors the dustfall of the operations and copies of the reports are available on site.
Implement best practice measures during the stripping of topsoil, loading, and transporting of the mineral from the site to minimize potential dust impacts.	5	-	Compliant	-
Air Quality and Noise Ambiance: Noise				
Ensure that employee and visitors to the site conduct themselves in an acceptable manner while on site.	5	-	Compliant	-
Do not permit loud music at the mining area.	5	-	Compliant	-
Ensure that all project related vehicles are equipped with silencers and maintained in a road worthy condition in terms of the National Road Traffic Act, 1996.	5	-	Compliant	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Implement best practice measures to minimise potential noise impacts.	5	-	Compliant	-
Appoint a qualified occupational hygienist to quarterly monitor and report on the personal noise exposure of the employees working at the mine. Monitoring must be done in accordance with the SANS10083:2004 (Edition 5) sampling method as well as NEM:AQA, 2004, SANS 10103:2008.	5	-	Compliant	The mine does have a qualified occupational hygienist who monitors compliance.
Geology and Soil				
Strip and stockpile the upper 300 mm of the soil before mining.	5	-	Compliant	Topsoil is stripped from all new mining areas.
Carefully manage and conserve the topsoil throughout the stockpiling and rehabilitation process.	5	-	Compliant	The topsoil is stockpiled separately, signposted and conserved for rehabilitation.
Ensure topsoil stripping, stockpiling, and re-spreading is done in a systematic way. Plan mining in such a way that topsoil is stockpiled for the minimum possible time.	N/A	-	-	No topsoil was respread during the audit period.
Place the topsoil heaps on a levelled area within the mining footprint area. Do not stockpile topsoil in undisturbed areas.	5	-	Compliant	-
Protect topsoil stockpiles against losses by water- and wind erosion. Position stockpiles so as not to be vulnerable to erosion by wind and water. Establish plants (weeds or a cover crop) on the stockpiles to prevent erosion.	5	-	Compliant	Vegetation established on most of the topsoil heaps.
Ensure that topsoil heaps do not exceed 2 m to preserve micro-organisms within the topsoil, which can be lost due to compaction and lack of oxygen.	5	-	Compliant	-
Keep temporary topsoil stockpiles free of invasive plant species.	5	-	Compliant	On the day of the audit the topsoil stockpiles were free of listed invasive plant species.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Divert storm- and runoff water around the stockpile area to prevent erosion.	5	-	Compliant	-
Spread the topsoil evenly, to a depth of 300 m, over the rehabilitated area upon closure of the site.	N/A	-	-	The mine is not yet in final closure.
Strive to re-instate topsoil at a time of the year when vegetation cover can be established as quickly as possible afterwards, to that erosion of returned topsoil is minimized. The best time of year is at the end of the rainy season.	N/A	-	-	
Plant a cover crop immediately after spreading topsoil to stabilise the soil and protect it from erosion. Fertilise the cover crop for optimum production. Rehabilitation extends until the first cover crop is well established.	N/A	-	-	
Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement	N/A	-	-	
Hydrology, Geohydrology and Groundcover (including wetlands): Mitigating the impact on the Sand River, Riparian Areas, and Downstream Users				
Do not change, dam, or divert the flow of the river without prior authorisation from the Department of Water and Sanitation (DWS).	5	-	Compliant	The Water Use Licence of the mine makes provision for the mining of sand from the riverbed.
Do not allow activities to take place, without the necessary authorisation from the DWS, within a horizontal distance of 100 m from any watercourse or estuary or within a 500 m radius from a delineated boundary of any wetland or pan.	5	-	Compliant	The WUL (water use licence) was approved, and a copy of the document is available on site.
Always adhere to the requirements of the water use authorisations to be obtained prior to the commencement of the mining activities.	TBC	-	-	As mentioned earlier, the operations are audited separately to determine compliance with the WUL conditions. That audit report is then submitted to the DWS.
Do not store any equipment within the riverbed.	5	-	Compliant	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Establish a 38 m buffer and maintain as no-go area around the river channel, wetland conditions (marginal- and lower zones), lateral streams, and backwater wetlands. Floodplain/riparian area mining, and processing must be established outside the 38 m buffer area.	5	-	Compliant	Mining of the sand deposits on the riverbanks remains >38 m from the river and or drainage lines.
Limit excavations to the mining of a maximum of two minor areas, supported by one processing area at any given time.	5	-	Compliant	The mine did not excavate more than two areas at a time during the audit period.
Once an area is mined, rehabilitate it prior to the opening of a consecutive minor area.	1	1	Being addressed	Although the previously mined area to the east was not fully rehabilitated before the western excavations commenced, the eastern pit is currently utilised as a series of settling ponds. This ensures that the sediment load from wash water is retained within the pit and does not enter the river system. Over time, the accumulated sediment gradually infills the void, contributing to passive rehabilitation. The eastern excavation will be rehabilitated in full once it is no longer required for use as settling pond.
Only use one sand pump, including infrastructure and access road, at any time and rehabilitate the area immediately after moving the pump to another location along the site.	5	-	Compliant	The mining of sand from the riverbed commenced during the audit period.
Carefully select the entrance point into the river to minimise disturbance of the marginal zone and avoid the steep banks of the river. Clearly demarcate the entrance to prevent sprawling.	5	-	Compliant	The mine opened only one entrance into the river.
Adequately rehabilitate, including re-instatement of the natural topography, replacement of topsoil, prevention of erosion and monitoring and eradication of problematic weeds and invasives, any disturbance of the riverbank.	N/A	-	-	Not yet applicable.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Keep the removal of vegetation to a minimum where disturbance of the banks or floodplain takes place.	5	-	Compliant	-
Arrange that an appropriately qualified specialist conduct a walk-through inspection to identify any sensitive and/or protected plants that may have to be relocated before any vegetation is removed. Special focus must be placed on species such as <i>Ammocharis coranica</i> , <i>Crinum bulbispermum</i> , <i>Kniphofia ensifolia</i> . If needed, apply for plant relocation/destruction permits, and filed on site for auditing purposes.	N/A	-	-	Not applicable for this audit period as the mine did not open new natural areas.
Implement adequate storm water management measures including diverting storm- and floodwater around the stockpile and excavation areas and preventing sediment and silt from entering the river.	1	3	Addressed	At the time of the inspection, the process water from the cyclone drained directly back to the river. This approach has since been changed and the water now drains to the central excavation and is contained. No sediment rich water is released directly into the river.
Take necessary precautions to ensure that floodwaters are diverted around the processing/stockpile- and excavation areas by means of berms.	4	3	To be addressed	The stormwater berms of the site needs to be maintain and improved in areas where erosion of material occurred.
Endeavour to re-instate a geomorphology which will form part of a functional system and refrain from leaving open excavations or pits upon rehabilitation.	N/A	-	-	Not yet applicable.
Follow a comprehensive monitoring programme to quantify impacts and recommend mitigation. Such monitoring must include quarterly water quality sampling, sediment release (turbidity), Index of Habitat Integrity and SASS5 or a combination thereof.	5	-	Compliant	The mine follows a comprehensive water monitoring programme that is compliant with the WUL requirements and proof is available on site.
Implement continued bi-annual monitoring of the habitat, macro-invertebrate, and fish communities at the reference sites, which vary seasonally.	5	-	Compliant	



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Hydrology, Geohydrology and Groundcover (including wetlands): Erosion Control and Stormwater Management				
Implement the Stormwater Management Plan.	5	-	Compliant	-
Divert storm water around the topsoil heaps and mining areas to prevent erosion.	4	3	To be addressed	Refer to earlier comment regarding the stormwater berms.
Control all drainage from the project area to prevent off-site pollution, flooding, or damage to infrastructure downstream of any storm water discharge points.	1	3	Addressed	Refer to the earlier comment regarding process water diverted from the cyclone to the central excavation.
Use silt traps where there is a danger of topsoil or material stockpiles eroding and entering the river and other sensitive areas.	1	3	Addressed	
Conduct activity in terms of the Best Practice Guidelines for small-scale mining.	3	3	Management to be intensified	- At the time of the inspection the used oil drums were outside the bunded area. This has since been addressed. - The bund of the hazardous waste storage area must be sealed, and the integrity must be maintained.
Mining, Biodiversity and Groundcover: Impacts on ESA and Broad-Scale Ecological Processes				
Clearly demarcate the mining boundaries and contain all operations to the approved mining area.	5	-	Compliant	The mining boundaries near the immediate operational area are demarcated, and mining is contained to the approved area.
Declare the area outside the mining boundaries a no-go area and educate all employees accordingly.	5	-	Compliant	-
Implement an invasive plant species management plan on site to control weeds and invasive plants on denuded areas, topsoil heaps and reinstated areas.	5	-	Ongoing	As mentioned earlier, the problem plants are continuously removed as stipulated in the invasive plant species management plan.
Ensure the protection of the riverine ecology as far as possible. If not possible, transplant the endangered and/or protected species (if present) in compliance with the legislation and permits for the translocation of species.	5	-	Compliant	No protected species were identified that had to be transplanted. The ground lilies identified by the specialist (during the previous audit period) were flagged and the area declared a no-go zone.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Mining, Biodiversity and Groundcover: Invasive Plant Species				
Implement an invasive plant species management plan at the site to ensure the management and control of all species regarded as Category 1a and 1b invasive species in terms of NEM:BA, 2004. Do weed/alien clearing on an ongoing basis throughout the life of the mining activities.	5	-	Ongoing	-
Keep all stockpiles free of invasive plant species.	4	3	Ongoing	Site management continuously clears the problem plants from the mining area.
Control declared invader or exotic species on the rehabilitated areas.	N/A	-	-	No areas where rehabilitated during the audit period.
Terrestrial Fauna				
Ensure no fauna is caught, killed, harmed, sold, or played with.	5	-	Compliant	-
Remove any fauna directly threatened by the operational activities to a safe location.	N/A	-	-	Not yet applicable.
Provide environmental induction to all personnel regarding fauna management and in particular awareness about not harming or collecting species such as snakes, tortoises and owls which are often persecuted out of superstition. Instruct workers to report any animals that may be trapped in the working area.	5	-	Compliant	-
Prevent the setting of snares or raiding of nests for eggs or young.	5	-	Compliant	-
Restrict the speed of all vehicles (40 km/h is recommended) to avoid collisions with susceptible species such as snakes and tortoises.	5	-	Compliant	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Prevent activity at the site between sunset and sunrise, except for security personnel guarding the operation (if needed).	5	-	Compliant	-
Do not handle or antagonise any dangerous fauna (snakes, scorpions, etc.) that are encountered during construction. Contact a suitably qualified person(s) to remove the animals to safety.	N/A	-	-	Not yet applicable.
Do not throw or leave litter, food, or other foreign material around the site. Place this in demarcated rubbish and litter areas that are animal proof.	5	-	Compliant	-
Obtain the opinion and guidance of a suitably qualified person should any bats be noted in any of the mining areas.	N/A	-	-	Not yet applicable.
Demarcate the mining activities with beacons rather fences to allow free movement of roaming species.	5	-	Compliant	-
Restrict all mining operations to daylight hours.	5	-	Compliant	-
Cultural and Heritage Environment				
Confine all mining to the development footprint area.	5	-	Compliant	-
Implement change find procedure when discoveries are made on site	N/A	-	-	Not yet applicable.
Implement Fossil Chance Find Procedure should fossils be uncovered.	N/A	-	-	
Socio-economic Environmental / Land Use				
If needed, sign mined/rehabilitated areas back to agricultural use once the cover crop stabilised.	N/A	-	-	Not yet needed.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Existing Infrastructure				
Divert storm water around the access road to prevent erosion.	5	-	Compliant	The access road to the mine was improved during the audit period.
Restrict vehicular movement to the existing access road to prevent crisscrossing of tracks through undisturbed areas.	5	-	Compliant	-
Repair rutting and erosion of the access road caused as a direct result of the mining activities.	5	-	Compliant	The access road was repaired/upgraded during the audit period.
Prevent the overloading of the truck and file proof of load weights for auditing purposes.	5	-	Compliant	-
General: Waste Management				
Ensure regular vehicle maintenance, repairs and services only take place at the workshop and service area. Ensure drip trays are present if emergency repairs are needed on equipment not able to move to the workshop. Dispose all waste products in a closed container/bin to be removed from the emergency service area (same day) to the workshop to ensure proper disposal.	5	-	Compliant	-
Provide all employees with ablution facilities. Ensure that the toilet is placed outside the 1:100-year floodline of the river.	5	-	Compliant	-
Ensure that ablution facilities drain into a septic tank with closed system. Do not install french drains on site.	5	-	Compliant	-
Ensure that the use of any temporary, chemical toilet facilities does not cause pollution to water sources or pose a health hazard. In addition, prevent any form of secondary pollution from the disposal of refuse or sewage from the temporary, chemical toilets. Address	N/A	-	-	No temporary/chemical toilets are used on site.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
any pollution problems arising from the above immediately.				
If a diesel bowser is used on site, always equip it with a drip tray. Ensure that drip trays are used during each refuelling event. The nozzle of the bowser needs to rest in a sleeve to prevent dripping after refuelling.	5	-	Compliant	-
Clean drip trays after use. Do not use dirty drip trays.	5	-	Compliant	-
Collect any effluents containing oil, grease or other industrial substances in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility.	5	-	Compliant	Fuell Collections, Oilkol and HazQuip removed the hazardous waste of the mine during the audit period. The sand mine's waste is transported to the Blazecor Quarry near Theunissen where the service providers then collect the waste. Proof is available on site.
Should spillage occur, such as oil or diesel leaking from a burst pipe, collect the contaminated soil, within the first hour of occurrence, in a suitable receptacle and remove it from the site, either for resale or for appropriate disposal at a recognized facility. File proof.	5	-	Compliant	-
Compile a waste management plan that focus on the waste hierarchy of the NEM:WA and implement it on site.	5	-	Compliant	-
Contain all general waste in marked, sealable, refuse bins placed at a designated area, to be removed when filled to a recognised general waste landfill site.	5	-	Compliant	-
Prevent the burning or burying of waste on site.	5	-	Compliant	-
Report any significant spillage of chemicals, fuels etc. during the lifespan of the mining activities to the DWS and other relevant authorities.	N/A	-	-	No significant spills occurred that had to be reported.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
General: Health and Safety Risks				
Ensure adequate ablution facilities and water for human consumption is daily available on site.	5	-	Compliant	-
Ensure that workers have access to the correct PPE as required by law.	5	-	Compliant	-
Manage all operations in compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).	5	-	Compliant	-
Environmental Authorisation Site Specific Conditions				
Mining activities conducted in accordance with the approved EMPR and the layout plans attached on page 19 of the EIAR & EMPR.	5	-	Compliant	-
The entire mining area must be fenced off, and a lockable gate must be installed. Access to the mine must be strictly controlled and measures must be put in place to ensure the safety of animals/wildlife and the public.	5	-	Compliant	-
Visible semi-permanent markers must be placed on the mining boundary before mining activities commences and must be kept for the duration of mining. Mining activities must strictly be conducted within the demarcated area.	5	-	Compliant	-
Mining area must be visibly subdivided into strips and mining must be confined to a strip at a time. Mining must proceed to the next strip once the previous mined strip has been successfully rehabilitated.	5	-	Compliant	The operational footprint of the mine is ±5.3 ha that is less than the approved 6.5 ha.
Sand mining activities including excavations must be conducted or commence exactly 9 m away from the mining area boundary. The 9 m buffer must be demarcated with visible beacons, and it must be	4	3	To be addressed	The 9 m buffer must be demarcated.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
treated as a no-go area for the duration of the mining activities.				
Mining activities must be conducted concurrently with rehabilitation and measures such as mulching and/or immediate cover with vegetation must be taken to make sure that the rehabilitated surface is protected from forces of erosion.	5	-	Compliant	-
At least 350 mm of topsoil must be stripped from each strip before mining activities commences. The topsoil must be stockpiled within the mining area and be replaced onto the mined area during rehabilitation.	5	-	Compliant	-
The stockpiled topsoil must be protected from and/or against losses by water and wind erosion. Driving over topsoil stockpile is prohibited	5	-	Compliant	-
The installation of diesel tanks onsite must comply with the approved EMP. Diesel tanks must be placed in a bunded or impermeable area to avoid soil and or water pollution. Diesel tanks storage area must be designed in such a way that they do not come into contact with stormwater during and also to cater for accidental damage or leakage of the tanks. Refuelling area must be bunded and during refuelling, drip trays must be placed below the pumps to prevent soil contamination and water pollution.	5	-	Compliant	Although no new diesel tanks were installed since the commencement of the mining right, the existing tank complies with these requirements.
After mining, steep slopes at the edges of excavations must be reduced to a slope of 1:3 and profiled to blend in with the surrounding topography.	5	-	Compliant	The mined areas are benched and sloped as mining progresses.
Sand leaving the site must be covered with a tarpaulin cloth during transportation to prevent sand from begin	1	3	To be implemented	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
blown away by wind and causing pollution nuisance to other road users and the public.				
Construction of access roads within the mining area must strictly comply with the approved EMPR and this EA.	N/A	-	-	No new roads were constructed during the audit period.
Alien vegetation must be cleared on an ongoing basis during mining activities and after rehabilitation.	5	-	Ongoing	-
A surface slope must be maintained across the mining area in the drainage direction, so that excavation is freely drained.	N/A	-	-	The excavations are not free draining as it is used as settling ponds.
Dust suppression measures must be implemented during mining activities, and this may include spraying the mining area and access road with water and/or an environmentally friendly dust-allaying agent. Dust prevention measures such as sprayers must be incorporated onto the screening plants to limit the generation of dust.	5	-	Compliant	-



ENVIRONMENTAL PERFORMANCE ASSESSMENT
DE KLERKSKRAAL SAND MINE

COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S
(APPENDIX 7 SUB-REGULATION 3(G) & (J))

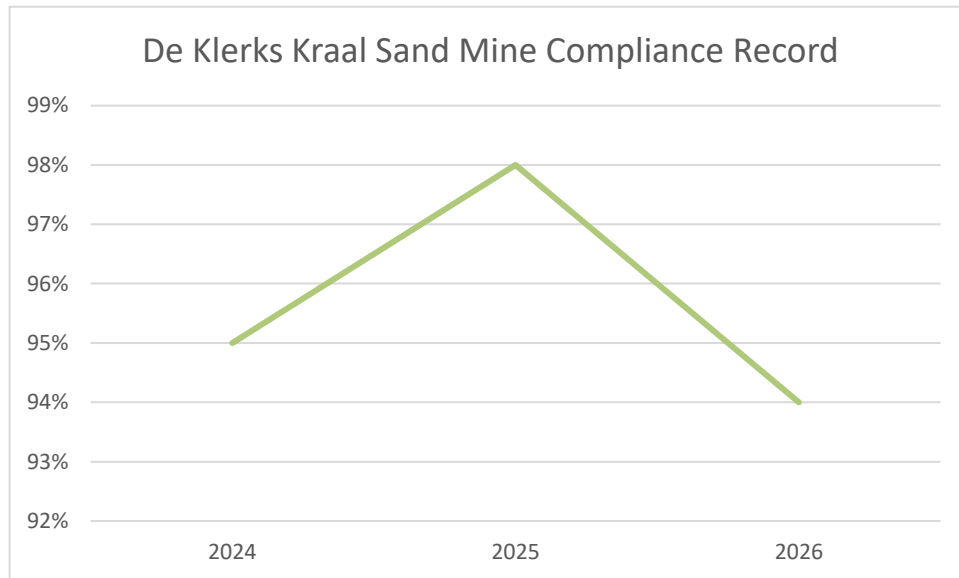
No written comments or complaints were received from any of the surrounding I&AP's.

AUDITING OF EMP AND REPORTING THEREOF
(REGULATION 34):

Date of previous EAR/EPA:	The previous EPA was done in June 2025.
Proof of submission of previous EAR/EPA to DMPR available:	The 2025 EPA was submitted to the DMPR on 09 July 2025, and proof of submission is available on site.
EAR/EPA compiled by independent person with environmental auditing expertise:	Greenmined Environmental (Pty) Ltd compiled the EPA.
Potential and registered I&AP's notified within 7 days of the submission date, and report available on publicly accessible website	The EPA will be available on the Greenmined website that is a publicly accessible website.

GENERAL REPORT

The De Klerks Kraal Sand Mine achieved an overall compliance score of 94% for the 2025–2026 audit period. The audit confirmed that the majority of the environmental management commitments contained in the approved Environmental Management Programme (EMPr) are being effectively implemented.



The active mining area remains within the approved operational footprint, and the site was generally found to be neat and well maintained. Dust suppression measures continue to be effectively implemented and are supported by monthly dustfall monitoring, while quarterly occupational hygiene monitoring is undertaken to verify compliance with occupational noise requirements. The topsoil is signposted and conserved for future rehabilitation, with vegetation successfully established on most stockpiles to minimise erosion. The historic eastern excavation continues to function as a settling pond, promoting sediment deposition while simultaneously contributing towards the progressive rehabilitation of the excavation. Environmental records, licences, monitoring reports and statutory documentation were all available on site at the time of the inspection.

One significant finding identified during the audit related to the management of process water and sediment-rich stormwater. At the time of the inspection, the process water and sediment-laden runoff from the processing plant was discharged directly into the Sand River before adequate settlement had taken place. Such discharge has the potential to increase sediment loads within the river and should be prevented through the effective containment, settlement and recirculation of process water in accordance with the approved EMPr and Water Use Licence. Following the audit inspection, the mine implemented corrective measures by redirecting process water to the central excavation for settlement and recirculation where practicable, thereby significantly reducing the risk of sediment entering the river. This matter will be verified during the next audit.

No evidence of significant pollution, unmanaged waste, hydrocarbon contamination or other material environmental impacts was observed during the site inspection. Overall, the mine continues to demonstrate a good level of environmental performance, and with the implementation of the corrective action relating to process water management, the operation is considered capable of maintaining compliance with its environmental obligations.



ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

DOCUMENT CHECKLIST

<u>RELEVANT DOCUMENTATION</u>	<u>PRESENT ON SITE</u>	<u>COMMENTS</u>
Mining right	Yes	-
Mine works programme	Yes	-
Social and labour plan	Yes	-
Approved EMPR	Yes	-
EA	Yes	-
Regulation 42 Mine Plan (annually updated)	Yes	-
Financial Provision Calculation (2025)	Yes	-
EPA (2025)	Yes	-
Water Use Licence	Yes	-
Waste register and permits for waste removal	Yes	-
Incidents register	Yes	-
Complaints register	Yes	-
Proof of environmental awareness training	Yes	-
MSDS's for chemicals	Yes	-
Emergency Preparedness Plan	Yes	-
Invasive plant species plan (part of the EIAR and EMPr – Appendix L)	Yes	-
Stormwater Management Plan (part of the EIAR and EMPr – Appendix I)	Yes	-

MATTERS TO BE ADDRESSED ON SITE

- Continue with the removal of all problem plants;
- Demarcate the 9 m buffer as required in the EA;
- Cover trucks with tarpaulins as required in the EA;
- Maintain all stormwater berms and structures and prevent sediment rich water flowing directly into the river;
- Check the integrity of the hazardous waste storage area bund at least monthly; and
- Keep all hazardous waste containers in the bunded area.

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

The approved EMPR and EA of the mine adequately manage/mitigate the environmental impacts on site, and no need was identified to amend the said documents.

FINANCIAL PROVISION

The annual review of the financial provision amount for the rehabilitation of the mining area accompanies this document. The 2026 financial provision required to rehabilitate the mining area in accordance with the Guideline Document for the Evaluation of the Quantum of Closure-related Financial Provision by a Mine and as prescribed in terms of Regulation 54 (1) is R 613 081.76. The 2026 financial provision does not exceed the value of rehabilitation amount in place at the DMPR, and the right holder therefore did not have to provide a shortfall.

ECO SIGNATURE

NAME	SIGNATURE	DATE
Christine Fouché	<i>Christine Fouché</i>	30 June 2026

PHOTOGRAPHS

PHOTOS OF THE MINING AREA	
	
Processing and storage area	
	
Used oil drums to be placed inside bunded area	Drums moved to the bunded area

PHOTOS OF THE MINING AREA



Bunded area to be sealed



Invasive alien plants removed from site

PHOTOS OF THE MINING AREA



Bund of the diesel storage area in tact



Oil spill kit on site



Eastern excavation used as settling ponds

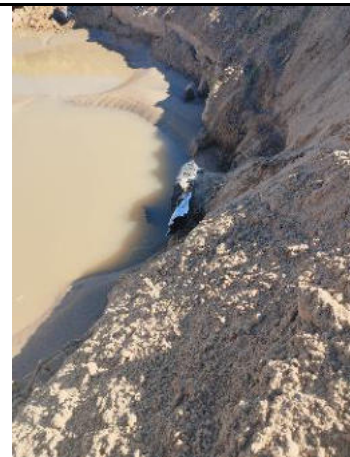
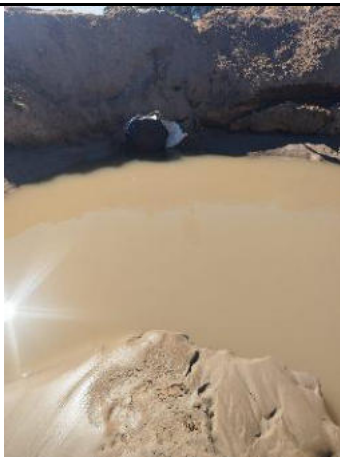
PHOTOS OF THE MINING AREA



Sand pump and associated infrastructure



Water draining from the plant back to the river – stopped after inspection

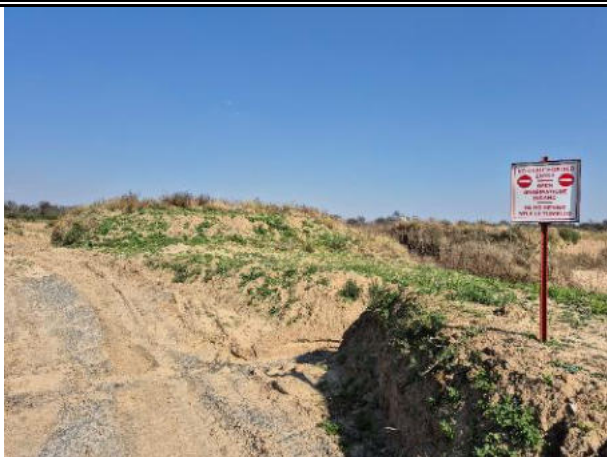


Pipe that used to take water directly into the river blocked off

PHOTOS OF THE MINING AREA



Water directed to the central excavation instead of draining to the river – since inspection



Signage used on site

Central excavation

PHOTOS OF THE MINING AREA



Central excavation



Western excavation

ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

PROOF OF DOCUMENTATION

[illegible]

Complaints register

[illegible]

Induction attendance register

ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

PROOF OF DOCUMENTATION

[illegible]

General waste disposal register

[illegible]

Proof of safe disposal of used oil

ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

PROOF OF DOCUMENTATION

Name of person reporting incident	Incident	Date of incident	How was the incident addressed	Date incident was resolved	Signature

Incidents register

2026 Mine plan

MINE BOUNDARY _____

EXISTING STRUCTURES _____

EXISTING WALLS _____

EXCAVATED AREA _____

SURVEYOR: _____

SIGNATURE: _____

DATE: 7/6/26

MANAGER: _____

SIGNATURE: _____

DATE: 7/6/26

THIS PORTION OF THE GENERAL SURFACE PLAN IS TO BE USED TO THE BEST OF THE SURVEYOR'S KNOWLEDGE

2026 Mine plan

ENVIRONMENTAL PERFORMANCE ASSESSMENT DE KLERKS KRAAL SAND MINE

PROOF OF DOCUMENTATION

[illegible]

Water use registers

[illegible]

BIONITORING PROGRAMME FOR
VENGBLOK SAND MINE, FREE STATE PROVINCE.

APRIL 2026
WET SEASON SURVEY

Report reference: VSI/AGS

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Water monitoring reports