

MALMESBURY SANDS (PTY) LTD KERSFONTEIN SAND MINE MALMESBURY, WESTERN CAPE PROVINCE

ENVIRONMENTAL PERFORMANCE ASSESSMENT



DMPR REFERENCE NUMBER:	WC 30/5/1/2/2/360 MR
AUDIT PERIOD:	SEPTEMBER 2025
SITE SCORE	97,61%

PREPARED FOR:

Nkulu Resources (Pty) Ltd
 Contractor:
 Contact Person: Mr Cobus Visage
 Tel: 011 972 1349
 Cell: 064 521 8387
 Email: operatations@nkulu.co.za
 Postal Address:
 187 High Road
 Bredell, Kempton Park
 1619

PREPARED BY:

Greenmined Environmental
 Auditor: Ms Zoë Norval
 Tel: 021 851 2673
 Cell: 072 759 9059
 Fax: 086 546 0579
 Postal Address:
 Suite 62
 Private Bag x15
 Somerset West
 7129



1. PROJECT SPECIFIC DETAIL

ITEM	MINING RIGHT/PERMIT HOLDER
Company Name	Nkulu Resources (Pty) Ltd
Contractor:	Cloete's Sand & Aggregates (Pty) Ltd
Contact Person	Cobus Visagie
Tel Number	011 972 1349
Cell Number	064 521 8387
E-mail Address	operatations@nkulu.co.za
Postal Address	87 High Road Bredell, Kempton Park 1619
ITEM	CONSULTANT DETAIL
Company Name	Greenmined Environmental
Contact Person	Ms Zoë Norval
Tel Number	021 851 2673
Cell Number	072 759 7095
E-mail Address	zoe@greenmined.co.za
Postal Address	Postnet Suite 62 Private Bag x15 Somerset West 7129
ITEM	LOCATION AND AREA INFORMATION
Site Name	Kersfontein Sand Mine
Property Description	Farm No 1244 (Consolidation of subdivided portion of Remainder of Nooitgedacht No 828, Remainder of Portion 1 of Nooitgedacht No 828, Farm No 826 and Farm 827) and Portion 1 of Farm No 1243 (Subdivided portion of Remainder of Nooitgedacht No 828).
Location	The mine is located ±10 km south-south-east of Malmesbury along the old Cape Town Road between Abbotsdale and Kalbaskraal.
Size of Mining Area	1 347.4009 ha



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2. ENVIRONMENTAL AUDIT REPORT

PROJECT DETAIL

Right Number:	WC 30/5/1/2/2/360 MR	Date of Commencement:	Cloete's Sand & Aggregates (Pty) Ltd commenced as sub-contractor: May 2024
Site Name:	Kersfontein Sand Mine	Inspection Date:	11 September 2025
Right Holder:	Nkulu Resources (Pty) Ltd	Other Authorisations:	WULA : 2018/03/16 Certificate:22140112
Report Number:	06		

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> <p style="text-align: center;">Zoë Norval</p> <p style="text-align: right;">Date: 30 September 2025</p>

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 2017).

OBJECTIVE:

The objective of the environmental audit report (EAR) is to evaluate compliance of the operational activities with the Environmental Management Programme Report (EMPR) as approved by the Department of Mineral and Petroleum Resources (DMPR).

INSPECTED AREAS:

The inspection included an assessment of the following areas:

- Site Office
- Section A Mining Area; and
- Section B Rehabilitated area

In order to establish the environmental compliance assessment of the operation, the mining site was inspected on foot by the Environmental Control Officer Zoë Norval, of Greenmined Environmental (Pty) Ltd accompanied by site management of Nkulu Resources: Mr. Cobus Visagie.

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 site management. No uncertainties or gaps in knowledge could be identified that is applicable during this audit period.

LOCATION

<p>Site Location:</p>	<p>The mine is located ±10 km south-south-east of Malmesbury along the old Cape Town Road between Abbotsdale and Kalbaskraal.</p>	
<p>Site Map:</p>		
<p>Site Coordinates:</p>	<p>Decimal Degrees</p>	<p>Degrees Minutes Seconds</p>
	<p>A -33.539691° S 18.666478°E</p>	<p>A 33°32'22.89" S 18°39'59.32"E</p>
	<p>B -33.544138° S 18.675238°E</p>	<p>B 33°32'38.90" S 18°40'30.86"E</p>
	<p>C -33.541032° S 18.718053°E</p>	<p>C 33°32'27.72" S 18°43'04.99"E</p>
	<p>D -33.544146° S 18.719807°E</p>	<p>D 33°32'38.93" S 18°43'11.31"E</p>
	<p>E -33.543696° S 18.713166°E</p>	<p>E 33°32'37.30" S 18°42'47.40"E</p>
	<p>F -33.550397° S 18.713784°E</p>	<p>F 33°33'01.43" S 18°42'49.62"E</p>
	<p>G -33.554154° S 18.710484°E</p>	<p>G 33°33'14.96" S 18°42'37.74"E</p>
	<p>H -33.561119° S 18.712720°E</p>	<p>H 33°33'40.03" S 18°42'45.79"E</p>
	<p>J -33.573360° S 18.688632°E</p>	<p>J 33°34'24.10" S 18°41'19.07"E</p>
	<p>K -33.573844° S 18.681625°E</p>	<p>K 33°34'25.84" S 18°40'53.85"E</p>
	<p>L -33.571506° S 18.675335°E</p>	<p>L 33°34'17.42" S 18°40'31.21"E</p>
	<p>M -33.571986° S 18.670044°E</p>	<p>M 33°34'19.15" S 18°40'12.16"E</p>
	<p>N -33.550074° S 18.662366°E</p>	<p>N 33°33'00.26" S 18°39'44.52"E</p>
	<p>P -33.546720° S 18.661193°E</p>	<p>P 33°32'48.19" S 18°39'40.29"E</p>
	<p>Q -33.545227° S 18.662486°E</p>	<p>Q 33°32'42.82" S 18°39'44.95"E</p>
	<p>R -33.544872° S 18.662843°E</p>	<p>R 33°32'41.54" S 18°39'46.23"E</p>
	<p>S -33.543692° S 18.663883°E</p>	<p>S 33°32'37.29" S 18°39'49.98"E</p>
	<p>T -33.543238° S 18.664260°E</p>	<p>T 33°32'35.66" S 18°39'51.34"E</p>
	<p>U -33.542544° S 18.664786°E</p>	<p>U 33°32'33.16" S 18°39'53.23"E</p>
	<p>V -33.541552° S 18.665540°E</p>	<p>V 33°32'29.59" S 18°39'55.94"E</p>
	<p>W -33.541372° S 18.665637°E</p>	<p>W 33°32'28.94" S 18°39'56.29"E</p>
	<p>X -33.541420° S 18.665754°E</p>	<p>X 33°32'29.11" S 18°39'56.71"E</p>
	<p>Y -33.541086° S 18.665957°E</p>	<p>Y 33°32'27.91" S 18°39'57.45"E</p>
	<p>Z -33.541029° S 18.665825°E</p>	<p>Z 33°32'27.70" S 18°39'56.97"E</p>

PROJECT DESCRIPTION

Malmesbury Sands (Pty) Ltd held an old order mining right (ML 2/2003) that was converted into a mining right (Protocol No: 95/2018) for Sand and Laterite Gravel in respect of the abovementioned properties on 09 October 2018. The mining right was approved over 1 347.4009 ha and is valid until 08 October 2048.

A Section 11 application has been submitted to the Department of Mineral and Petroleum Resources (“DMPR”) to approve the transfer of ownership from Malmesbury Sands (Pty) Ltd to Nkulu Resources (Pty) Ltd. The notary is currently in the process of executing the Deed of Cession. Once executed, the Deed of Cession, together with its annexures, will be lodged with the Mineral and Petroleum Title Registration Office for registration and endorsement. Upon completion, the original endorsed documents will be provided to Nkulu Resources (Pty) Ltd. The sand mine is operated by Cloete’s Sand and Aggregates (Pty) Ltd, although the holder of the mining right is Nkulu Resources (Pty) Ltd.

The Kersfontein Sand Mine consists of two separate mining areas referred to by site management as Section A and Section B, that were respectively subdivided into the areas listed in the table below.

PHASE NAME	PHASE SUBDIVISION
SECTION A	
Phase A1	A1-1
	A1-2
	A1-3
	A1-4
	A1-5
Phase A2	A2-1
	A2-2
Phase A3	A3
SECTION B	
Phase B1	B1-1
	B1-2
	B1-3
Phase B2	B2

As per the EMPr (2010), mining must be conducted in the following manner:

- Excavator removes topsoil to the adjacent floors;
- Excavator loads 0.5 – 1.2 m deep in-situ subsoil directly to the delivery truck;
- Excavator retains minimum 150 mm sand drainage layer in base of excavation as a drainage layer;
- At the end of the ±300 m long windrow, the excavator moves to the start of the block and excavates another windrow;
- When the windrowed area attains 300 m x 600 m (2 ha) a bulldozer:
 - rip the 150 mm residual sand/gravel to 300 – 500 mm deep at 1.0 m centres;
 - smooth off the topsoil windrows to cover the ripped floor.

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Where mining of an upper horizon of sand and a lower gravel horizon occur, the excavator follows the same process as above but will first load the upper sand and then return to load out the gravel to separate delivery vehicles. However, there is no current sand over gravel mining where substrate gravels occur, and therefore only sand is loaded from the active mining areas.

The new site manager confirmed that mining is not currently being conducted in 2-hectare sections, nor to the prescribed depth of 1.2 m (extending up to 2 m) as stipulated in the approved EMPr, as this method has proven economically unfeasible. The mine therefore intends to submit a Section 102 application to amend the approved mining method in the EMPr to align with current on-site practices. However, progressive rehabilitation is still carried out once an area has been mined out. Site management further indicated that mining has not yet commenced on Section B, as this area had previously been rehabilitated by SPH, the former contractor. They will provide notification once a decision is made to begin mining activities in Section B.

SITE CONDITIONS

Cool and over casted weather conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date:	An incident register is kept at the site office of the mine. No environmental incidents were noted during the audit period.
Incident No:	
Incident:	
How addressed:	
When addressed:	

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

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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 (as amended 2017)	5	-	Compliant	The competent authority deems the approved EMPR and MR of the mine compatible with an Environmental Authorisation in terms of NEMA, 1998. DMPr approved the 2010 EMPR of the mine on 16 January 2020.
Copy of the MR and EMPR available on site	5	-	Compliant	EMPr available on site and included in photo report.
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002)	5	-	Compliant	-
Mine plan annually reviewed: <ul style="list-style-type: none"> ▀ According to requirements stipulated in the EMPR pg 11. 	5	-	In Progress	Previous Mine Plan submissions were done by Site plan. Next submission will be done in November 2025.
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004)	5	-	Compliant	-
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	5	-	Compliant	-
National Water Act, 1998 (Act 36 of 1998)	5	-	Compliant	The mine holds a General authorisation - WULA : 2018/03/16 Certificate:22140112. Water used in dust suppression is bought from landowner.
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	4	2	Partially Compliant	The removal of Port Jackson trees is an ongoing process and will continue to be implemented in accordance with the requirements of NEM:BA.
Hazardous Substances Act, 1973 (Act 15 of 1973)	5	-	Compliant	-
SOIL MANAGEMENT (EMPR PG 4 – 6, 8):				
Windrow strip mining method implemented	5	-	Compliant	-
Topsoil stripping implemented	5	-	Compliant	Topsoil is stripped from new mining areas and stored on the adjacent floors.
Topsoil storage/stockpiling to adjacent floors	5	-	Compliant	
Topsoil and subsoil stored separately	5	-	Compliant	The topsoil is stockpiled, and the subsoil is the product sold by the mine.
Mined and windrowed areas rehabilitated	4	2	Partially	The mine rehabilitates the mined-out section however the

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
when area reaches 2ha.			Compliant	areas are greater than 2ha. The mine continues with progressive rehabilitation.
150 mm sand drainage layer retained in base of excavation.	5	-	Compliant	When applicable.
150 mm residual sand/gravel ripped 300 – 500 mm deep at 1.0 m centres.	N/A	-	-	Ripping only applies to the gravel areas and is not currently applicable, as only sand is loaded.
Topsoil returned to rehabilitated area: <ul style="list-style-type: none"> ■ Area A1 – Topsoil layer of 400 mm. No sand removal. ■ Area A2 – Topsoil layer of minimum 400 mm above 300 mm drainage layer. ■ Area B1 & 2 – Topsoil layer of minimum 400 mm over 100 mm gravel. ■ Section A1 extension – Topsoil layer of minimum 500 mm. ■ Section A3 – Topsoil layer of minimum 500 mm above 300 mm drainage layer. ■ Other areas – at least 300 mm topsoil layer. 	4	2	Partially Compliant	The cover depth report was submitted to the DMPR by Site Plan in November 2023. In 2024, Nkulu Resources (Pty) Ltd requested that the DMPR align the submission of the cover depth report with the Environmental Audit Report (EAR), to be submitted biennially. Please see Appendix A for proof of submission. Accordingly, the next reporting will take place in November 2025.
Ponding avoided and uniform floor with a surface gradient parallel to the natural surface.	5	-	Compliant	-
Employing direct rehabilitation methods.	5	-	Compliant	Continues rehabilitation is implemented.
Final perimeters of the pits sloped to flatter than 1:3 while the lower excavation is free draining.	5	-	Compliant	-
Rehabilitated areas vegetated	5	-	Compliant	The natural revegetation of the rehabilitated areas is deemed sufficient. Some of the rehabilitated areas were planted by the landowner for cattle grazing.
VEGETATION:				
Protected plants (if any) sheltered from mining activities	N/A	-	-	No protected plants were noted in the mining area.
Riparian vegetation protected	5	-	Compliant	-
Aliens & weeds controlled on site (at least 30 m around mining area)	4	2	Partially Compliant	As mentioned earlier, the removal of Port Jackson trees is an ongoing process and will continue to be implemented in

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
				accordance with the requirements of NEM:BA. Weeds must be removed from stockpiles.
FAUNA:				
All animals, birds and reptiles protected on site	5	-	Compliant	-
Operation providing an escape route for trapped animals	5	-	Compliant	-
AIR QUALITY & NOISE:				
Dust suppression implemented.	5	-	Compliant	Although dust suppression wasn't needed at the day of the inspection, site management confirmed that it is implemented when needed with the water bought from Landowner.
No potable water used to suppress dust	5	-	Compliant	The mine buys water from the farmer when dust suppression is needed.
Monthly fallout dust monitoring implemented	5	-	Compliant	Results for August 2023 – August 2025 included in the General Report section.
Dust monitoring equipment operational	5	-	Compliant	Greenmined Environmental conducts monthly fallout dust monitoring at the Kersfontein Sand Mine, and all results have consistently remained within the prescribed limits.
Noise control	5	-	Compliant	-
Mining equipment serviced regularly to ensure noise emissions are minimized	5	-	Compliant	-
ARCHAEOLOGICAL AND CULTURAL INTEREST (EMPR PG 15):				
Archaeological and/or cultural remnants protected.	N/A	-	-	No archaeological or cultural remnants were discovered during the audit period.
SURFACE WATER (EMPR PG 6):				
Natural drainage channels avoided by at least 100 m.	5	-	Compliant	-
Drainage lines demarcated and protected	N/A	-	-	Not applicable.
Water for dust suppression limited to ± 3 m ³ /day	5	-	Compliant	-
Site free of erosion caused by surface water runoff	5	-	Compliant	-
MANAGEMENT OF FUEL AND HAZARDOUS PRODUCTS (EMPR PG 6, 12, 14):				

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Hazardous material stored within a bunded area (110% capacity)	5	-	Compliant	-
Management of fuel and oil spills	5	-	Compliant	No oil and fuel spills noted on site.
Drip trays present when refuelling/servicing area done at the mining area	1	3	To be addressed	No drip trays were present under the stationery machine. Please see photo report.
Diesel bowser equipped with leak-free pump with a sleeve to rest nozzle in	5	-	Compliant	-
Sealed drip trays used and managed on site	5	-	Compliant	-
Mining equipment mechanically sound without visible oil leaks	5	-	Compliant	At the time of the inspection, the equipment working in the mining areas appeared to be mechanically sound.
Complete oil spill kit available on site	5	-	Compliant	-
Material safety data sheets (MSDS) available on site	5	-	Compliant	-
WASTE MANAGEMENT (EMPR PG 6, 14):				
Ablution facilities provided to site employees	5	-	Compliant	Silverleaf Toilet Services cleans site toilets – proof in photo report.
Site free of day-to-day litter	5	-	Compliant	Site appeared neat and well kept.
Waste collected in sealable containers	5	-	Compliant	
Contaminated soil placed in sealable containers marked for hazardous waste and daily removed to the site office.	5	-	Compliant	Hazardous waste is removed by site management to their head offices in Kraaifontein from where it is then removed by Phumelela Old Oil & African Green oil.
No overnight storage of used oils/oil contaminated parts.	5	-	Compliant	No used oils/contaminated parts are stored at the mining area. Hazardous waste is stored at the site offices until it is removed by the mechanics to Saldanha site.
General waste dumped at a recognised landfill site	5	-	Compliant	General waste is removed to the Malmesbury landfill site.
Hazardous waste removed by a registered waste handling contractor	5	-	Compliant	As above.
Spillages not disposed of into the environment, ditches, drains or water courses	5	-	Compliant	-
Waste disposal permits on site	5	-	Compliant	Waste register implemented and proof will be included in future reporting.
FIRE MANAGEMENT:				
Firefighting equipment available on-site	5	-	Compliant	-

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Employees trained in firefighting	5	-	Compliant	-
Combustibles kept away from fuel storage receptacles	5	-	Compliant	-
Major fires or explosions reported.	N/A	-	-	
MINE & EQUIPMENT MANAGEMENT:				
Visible semi-permanent markers at boundaries of the site.	N/A	-	-	Due to the vast size of the mining footprint (1 347 ha), the use of markers along the boundaries are deemed impractical. The mining area is fenced, and all mining occurs within the fenced areas.
Mining contained to designated mining area	5	-	Compliant	-
Mining area fenced	5	-	Compliant	The farms are fenced and access to the mining areas is controlled.
Is the contractor implementing good visual and housekeeping standards.	5	-	Compliant	The overall appearance of the mine was very neat.
Progressive rehabilitation of mined out areas	5	-	Compliant	-
ACCESS ROADS, VEHICLES & TRANSPORTING OF MATERIAL (EMPR PG 9, 14):				
Access roads selected in consultation with landowner.	5	-	Compliant	-
Access road maintained	5	-	Compliant	-
Movement of project related vehicles and machinery restricted to the approved mining area. No crisscrossing through undisturbed areas.	5	-	Compliant	-
Speed limit enforced within the mining area	5	-	Compliant	20km/h – speed limit signs were visible.
EMPLOYEE AND SAFETY MANAGEMENT:				
Workers inducted and informed of EMPr conditions	5	-	Compliant	All employees take part in annual inductions, and new employees are inducted as they join the workforce.
Proof of training available	5	-	Compliant	-
Workers provided with PPE	5	-	Compliant	-
Are there signs present, indicating the mining site and speed restrictions	5	-	Compliant	-
Effective access control to prevent unauthorised entry.	5	-	Compliant	-



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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
DMPR SPECIFIC CONDITIONS (NOT YET INCLUDED):				
Biennial EPA submitted to the DMPR including: <ul style="list-style-type: none"> ■ Surveyed map showing areas still to be mined, areas rehabilitated, and areas still to be rehabilitated, mine phases, topsoil removal and replacement schedule. ■ Depth of layer of soil replaced. ■ No-go areas ■ Gradient of the slope; and Description of the vegetation cover.	5	-	Compliant	The previous EPA of the mining area was done in August 2023. The 2025 report will be submitted to the DMPR in 2025, and the next EPA will be submitted in 2027. The cover-, and water depth monitoring reports and surveyed mine plan, will be submitted in November 2025.

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

No written environmental related complaints were received during the audit period.

AUDITING OF EA, EMPR AND REPORTING THEREOF
(REGULATION 34):

Date of previous EAR/EPA:	August 2023
Proof of submission to DMPR available:	All proof of departmental submission documents is filed.
EAR/EPA compiled by independent person with environmental auditing expertise:	The 2025 EPA was compiled by Greenmined Environmental (Pty) Ltd.
Potential and registered I&AP's notified within 7 days of the submission date, and report available on publicly accessible website	A copy of the EPA is available at the mine.

GENERAL REPORT

Compliance of the mining site with the EMPR (2010) was reviewed during the site assessment. The mining area recorded a compliance score of 97.61% for the audit period.

At the time of the inspection mining were in progress at Kersfontein 1: Section A

Section A:

As mentioned earlier, the mine confirmed that mining is not currently being undertaken in 2-hectare sections nor to the prescribed depth of 1.2 m (extending up to 2 m) as stipulated in the approved EMPr, as this method has proven economically unfeasible. However, progressive rehabilitation is still carried out once an area has been mined out. Pioneer species successfully established, through succession, on the rehabilitated areas to provide the re-instated footprints with a sufficient cover.

The overall appearance of the mining area is neat and well managed and site management continuously replaces the topsoil on mined-out areas. The successful replacement of topsoil propagates vegetation growth that in turn reduces dust generation from denuded areas. However, Port Jackson trees must be continuously removed to prevent further establishment. This is an ongoing process, as the species is highly invasive

Section B:

At Section B, Kersfontein 2, the area has remained undisturbed since rehabilitation was undertaken by the previous contractor in 2023. Although Google Earth imagery suggests that the area was not rehabilitated, ground-truth verification confirmed that rehabilitation had in fact been completed (refer to the attached photo

report). However, a portion in the southern section of Kersfontein 2 disturbed by SPH has not been rehabilitated, as the new mining right holder intends to mine that specific area in the future.

Weeds and/or Invader Plant Species:

The Port Jackson (*Acacia saligna*) trees germinating on the rehabilitated areas is and should be continuously removed. These plants are listed as Category 1b invasive species in terms of the National Environmental Management: Biodiversity Act, 2004 and Alien and Invader Species Regulations, amended 2016 and must be controlled. In terms of this legislation plants classified as category 1b (or 1a) species are invasive species which must be controlled and whenever possible removed and destroyed. Any form of trade or planting is strictly prohibited. Weeds must be regularly removed from stockpiles.

Site Management:

The site maintains a waste control book documenting all hazardous waste removal activities. Supporting invoices are attached in the photo report. Hazardous waste is managed by site management and transported to Cloetes Sand & Aggregates head office in Kraaifontein. From there, the waste is collected and removed by Phumelela Old Oil and African Green Oil.

Mine Plan:

According to page 11 of the EMPR, a map contains the following information must be compiled and sent to the DMPR on an annual basis:

- The depth of the topsoil and subsoil above the underlying layer on a grid of 50 m x 50 m;
- The area that has been rehabilitated;
- The area already mined;
- The still to be mined.

Upon approval of the upgraded EMPR (2010), the DMPR requested the following regarding the mine plan (Condition 27):

The holder must submit an Environmental Audit Report to this Department bi-annually (once in two years) and such report must be done by qualified Environmental Assessment Practitioner and must be in accordance to appendix 7 of the 2014 EIA regulations as amended; Further, it must contain amongst others the following:

- 27.1 A surveyed map indicating areas mined; areas still to be mined; areas rehabilitated and areas still to be rehabilitated;*
- 27.2 The surveyed map must also indicate the mine phases and a topsoil removal and replacement schedule for future mining activities;*
- 27.3 The depth of the layer of soil replaced on top of the under-laying rock/shale;*
- 27.4 No-go areas*
- 27.5 Gradient of the slope; and*
- 27.6 Description of the vegetation cover.*

Site management must ensure that the mine plan submitted to the DMPR complies with the above-mentioned requirements.

Dust Fallout dust monitoring:

Fallout dust monitoring was implemented from 2017. Units are placed in 4 locations on Phase A and four locations for Phase B also known as Kersfontein 1 and Kersfontein 2 (not in place as there are no mining activities).

Below is a list of the previous results from August 2023 to August 2025.

Kersfontein 1/ Section A

Month	Unit 1 mg/m ² /day	Unit 2 mg/m ² /day	Unit 3 mg/m ² /day	Unit 4 mg/m ² /day
August - Sep 2023	178	256	284	247
Sep - Oct 2023	111	162	214	198
Oct- Nov 2023	91	138	234	175
Nov – Jan 2024	194	110	163	107
Jan – Feb 2024	301	256	431	775
March – April 2024	27	26	90	443
April – May 2024	143	85	131	136
May – June 2024	28	41	13	14
June – July 2024	210	1009	427	228
July – August 2024	91	98	134	97
August - Sep 2024	583	267	90	123
Sep - Oct 2024	191	155	82	221
Oct- Nov 2024	191	34	134	97
Nov – Dec 2024	242	239	114	94
Dec – Jan 2025	260	425	73	76
Jan – Feb 2025	184	185	171	277
Feb – March 2025	255	108	256	493
March – April 2025	201	415	100	401
April – May 2025	89	67	81	134
May – June 2025	51	172	35	310
June – July 2025	87	69	16	16
July – August 2025	96	102	170	484

DOCUMENT CHECKLIST:

- Mining right - Present
- Mine works program - Present
- Social and labour plan - In progress
- Approved EMPR - Present
- Regulation 42 mine plan - In progress
- Financial provision - Present
- Environmental Assessment Report - Present
- Permit for waste removal - Proof of Sewerage Removal Present
- Monitoring results - Dust Monitoring (Present)
- Waste spreadsheet - Present
- Incidents register - Present
- Complaints Register - Present
- Environmental Awareness Training - Present
- Material Safety Data Sheets - Present
- Closure Plan - Present

MATTERS TO BE ADDRESSED:

- Drip trays to be placed underneath stationary vehicles.
- Port Jackson to be removed (ongoing process)

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

It is believed that the EMPR currently adequately manage and/or mitigate environmental impacts at the mining area.

NEED FOR AMENDMENT OF THE EMPR:

A need has been identified to amend the current mining method outlined in the EMPr, as the existing approach of mining in discrete 2-hectare sections has proven to be both operationally impractical and economically unfeasible. The method presents significant challenges in terms of efficient resource utilization, cost-effectiveness, and overall project viability. Therefore, it is necessary to revise the mining strategy to adopt a more practical and sustainable approach that aligns with both economic considerations and operational efficiency.

FINANCIAL PROVISION:

The previous calculations were undertaken by Site Plan (Pty) Ltd in 2024, and the financial provision value for the rehabilitation of the earmarked area was in the sum of R 1 646 760,00 for which amount a financial guarantee was lodged with the DMPR.

The 2025 financial provision amounted to R 430 979,71 which does not exceed the value of financial guarantee in place at the DMPR and has a surplus of R1 215 780,29. This amount does not exceed the value of financial guarantee in place at the DMPR, and the EA holder therefore does not have to provide a shortfall.

ECO SIGNATURE

NAME:	SIGNATURE:	DATE:
Zoë Norval		30 September 2025

PHOTOGRAPHS

ENTRANCE TO THE SITE



SITE OFFICE WITH FIRE EXTINGUISHER



ABLUTION TOILET



STORAGE CAGE WITH BUND



WASTE BINS



DIESEL TANK – DRIP TRAY BE PLACED UNDERNEATH



PROPER ROAD SIGNAGE



STATIONARY MACHINERY WITHOUT DRIP TRAY



PORT JACKSONS TO BE REMOVED



KERSFONTEIN 1 (SECTION A) - MINING AREA



WEEDS TO BE REMOVED FROM STOCKPILES



REHABILITATED AREAS WITH ADEQUATE VEGETATION COVER



KERSFONTEIN 2 (SECTION B) - REHABILITATED AREAS



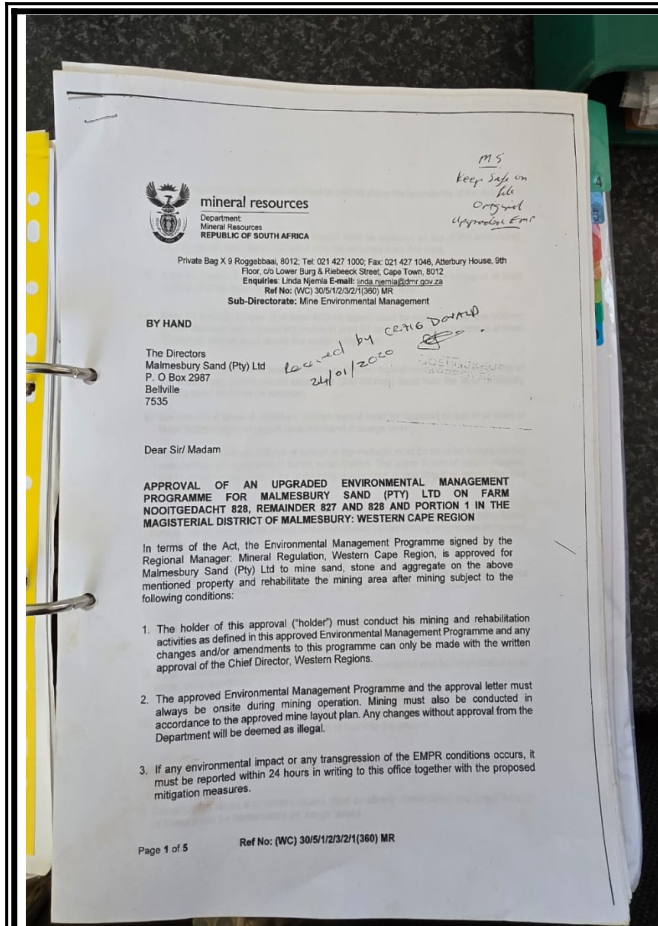


SOUTHERN SECTION IN KERSFONTEIN 2 – NOT REHABILITATED

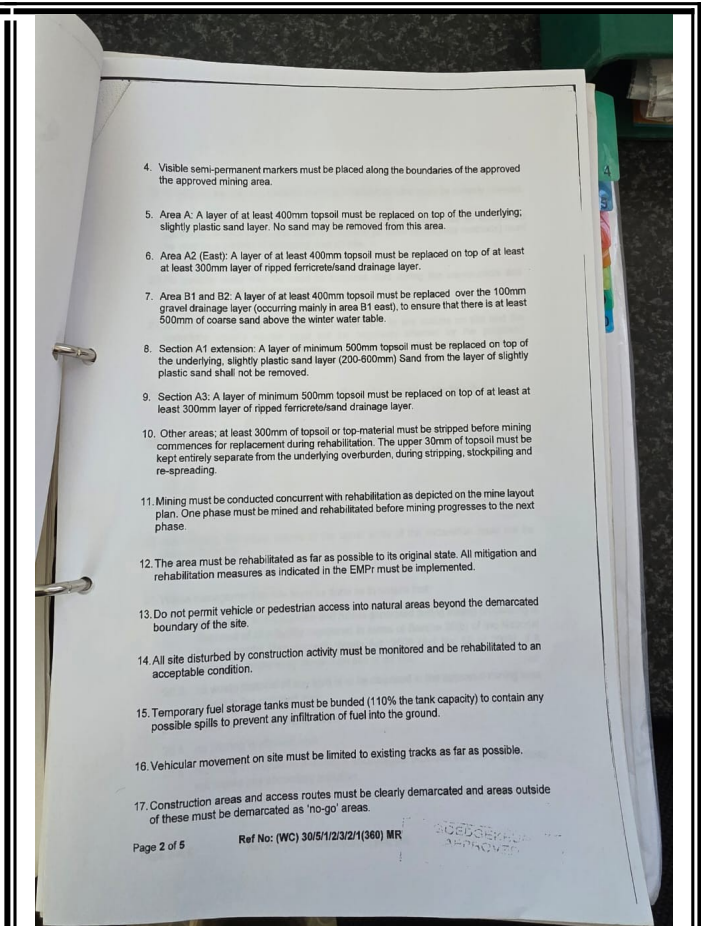


PROOF OF DOCUMENTATION

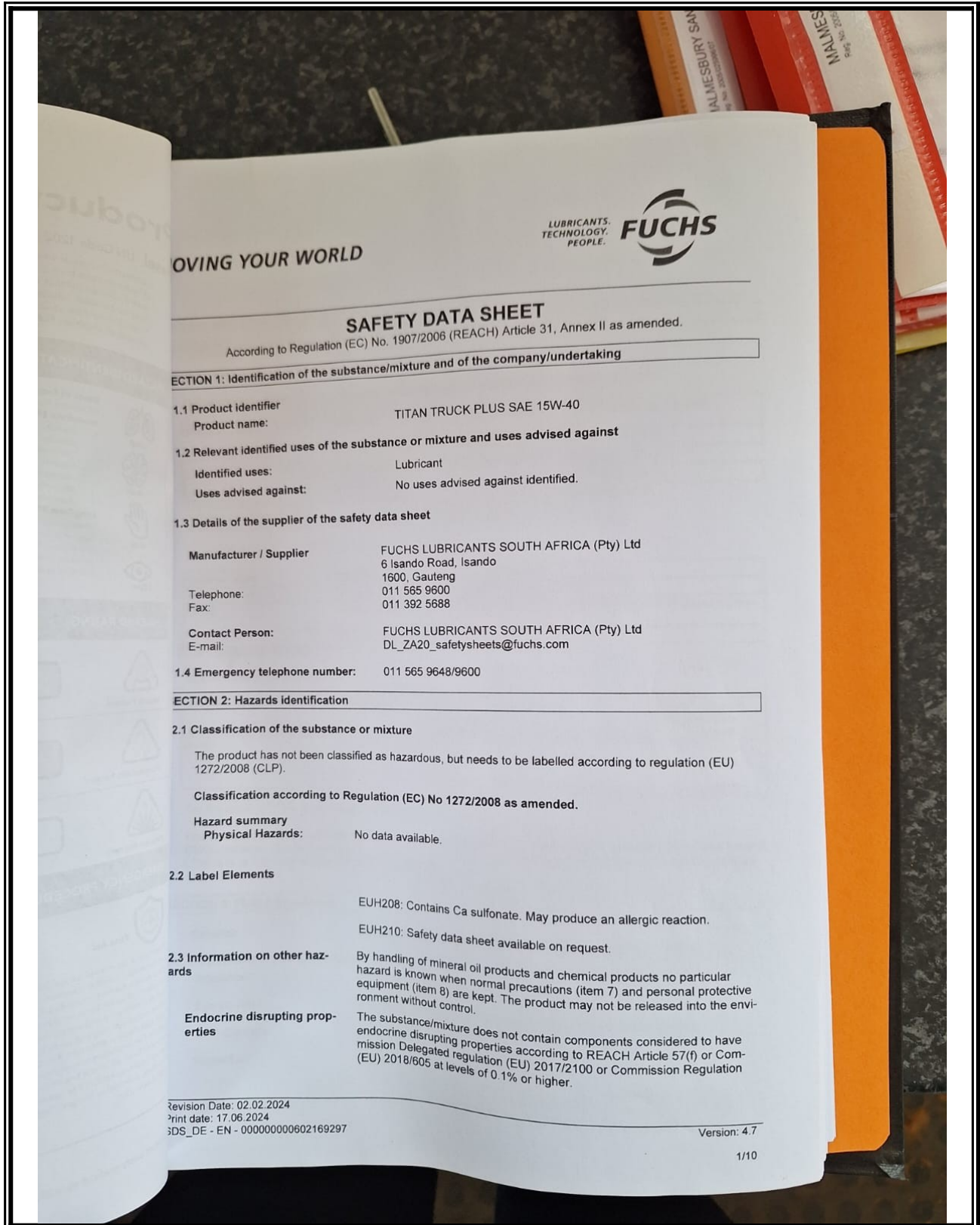
ENVIRONMENTAL PERFORMANCE ASSESSMENT
KERSFONTEIN SAND MINE



APPROVAL LETTER OF THE 2010 UPGRADED EMPr (received in 2020)



UPDATED 2010 EMPr WITH ANNEXURES AVAILABLE ON SITE



MOVING YOUR WORLD

LUBRICANTS. TECHNOLOGY. PEOPLE. **FUCHS**

SAFETY DATA SHEET
According to Regulation (EC) No. 1907/2006 (REACH) Article 31, Annex II as amended.

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1 Product identifier
Product name: TITAN TRUCK PLUS SAE 15W-40

1.2 Relevant identified uses of the substance or mixture and uses advised against
Identified uses: Lubricant
Uses advised against: No uses advised against identified.

1.3 Details of the supplier of the safety data sheet

Manufacturer / Supplier: FUCHS LUBRICANTS SOUTH AFRICA (Pty) Ltd
6 Isando Road, Isando
1600, Gauteng
Telephone: 011 565 9600
Fax: 011 392 5688

Contact Person: FUCHS LUBRICANTS SOUTH AFRICA (Pty) Ltd
E-mail: DL_ZA20_safetysheets@fuchs.com

1.4 Emergency telephone number: 011 565 9648/9600

SECTION 2: Hazards identification

2.1 Classification of the substance or mixture
The product has not been classified as hazardous, but needs to be labelled according to regulation (EU) 1272/2008 (CLP).
Classification according to Regulation (EC) No 1272/2008 as amended.
Hazard summary
Physical Hazards: No data available.

2.2 Label Elements
EUH208: Contains Ca sulfonate. May produce an allergic reaction.
EUH210: Safety data sheet available on request.

2.3 Information on other hazards
By handling of mineral oil products and chemical products no particular hazard is known when normal precautions (item 7) and personal protective equipment (item 8) are kept. The product may not be released into the environment without control.
Endocrine disrupting properties
The substance/mixture does not contain components considered to have endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 at levels of 0.1% or higher.

Revision Date: 02.02.2024
Print date: 17.06.2024
SDS_DE - EN - 00000000602169297

Version: 4.7
1/10

NG YOUR WORLD

LUBRICANTS. TECHNOLOGY. PEOPLE. **FUCHS**

SAFETY DATA SHEET

According to Regulation (EC) No. 1907/2006 (REACH) Article 31, Annex II as amended.

Section 1: Identification of the substance/mixture and of the company/undertaking

Product identifier
Product name: TITAN UTTO TO-4 SAE 50

Relevant identified uses of the substance or mixture and uses advised against
Identified uses: Lubricant
Uses advised against: No uses advised against identified.

Details of the supplier of the safety data sheet

Manufacturer / Supplier: FUCHS LUBRICANTS SOUTH AFRICA (Pty) Ltd
6 Isando Road, Isando
1600, Gauteng
Telephone: 011 565 9600
Fax: 011 392 5688

Contact Person:
Email: FUCHS LUBRICANTS SOUTH AFRICA (Pty) Ltd
DL_ZA20_safetysheets@fuchs.com

Emergency telephone number: 011 565 9648/9600

Section 2: Hazards identification

Classification of the substance or mixture
The product has not been classified as hazardous, but needs to be labelled according to regulation (EU) 272/2008 (CLP).

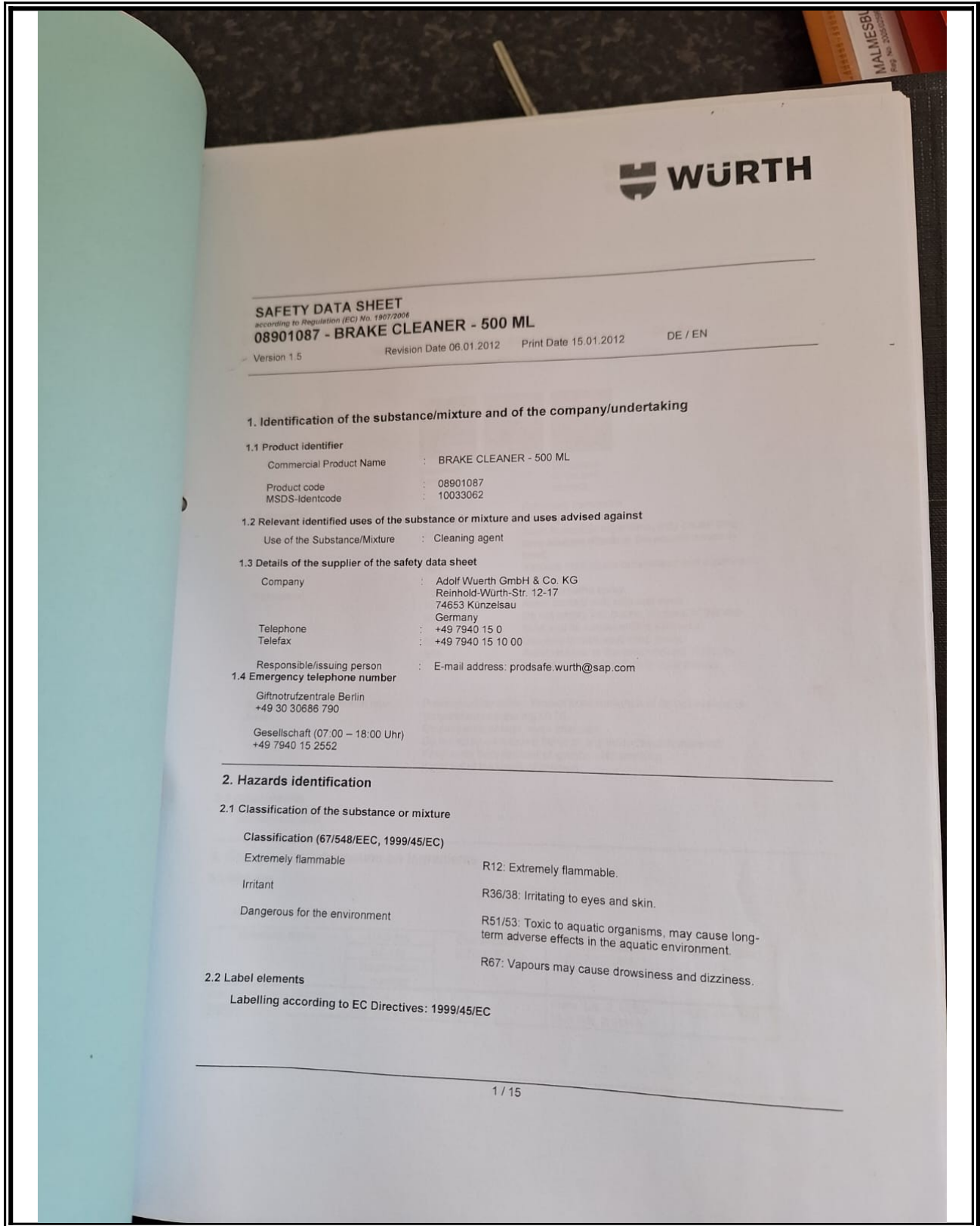
Classification according to Regulation (EC) No 1272/2008 as amended.

Hazard summary
Physical Hazards: No data available.

Label Elements
EUH210: Safety data sheet available on request.

Print Date: 14.12.2022
Issue Date: 17.06.2024
Product Code: EN - 00000000602160010

Version: 4.1



SAFETY DATA SHEET
according to Regulation (EC) No. 1907/2006

08901087 - BRAKE CLEANER - 500 ML

Version 1.5 Revision Date 06.01.2012 Print Date 15.01.2012 DE / EN

1. Identification of the substance/mixture and of the company/undertaking

1.1 Product identifier

Commercial Product Name : BRAKE CLEANER - 500 ML
Product code : 08901087
MSDS-Identcode : 10033062

1.2 Relevant identified uses of the substance or mixture and uses advised against

Use of the Substance/Mixture : Cleaning agent

1.3 Details of the supplier of the safety data sheet

Company : Adolf Wuerth GmbH & Co. KG
Reinhold-Würth-Str. 12-17
74653 Künzelsau
Germany
Telephone : +49 7940 15 0
Telefax : +49 7940 15 10 00
Responsible/issuing person : E-mail address: prodsafe.wurth@sap.com

1.4 Emergency telephone number

Giftnotrufzentrale Berlin
+49 30 30686 790
Gesellschaft (07.00 – 18:00 Uhr)
+49 7940 15 2552

2. Hazards identification

2.1 Classification of the substance or mixture

Classification (67/548/EEC, 1999/45/EC)

Extremely flammable R12: Extremely flammable.
Irritant R36/38: Irritating to eyes and skin.
Dangerous for the environment R51/53: Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.
R67: Vapours may cause drowsiness and dizziness.

2.2 Label elements

Labelling according to EC Directives: 1999/45/EC

Product safety guide

Diesel UN Code 1202 | Class 3

Combustible liquids which are used as fuels for compression ignition engines. Diesel fuels consist of a complex mixture of hydrocarbons from crude oil distillation or cracking. May contain biodiesel. Harmful or fatal if swallowed (aspiration hazard). Direct contact with the liquid may be irritating and cause skin cancer. Prolonged and repeated skin contact must be avoided. Inhalation of mists can cause irritation of nose, throat, and lungs. May cause dizziness and drowsiness. Product should be used as a fuel only. Store in accordance with local regulations regarding combustible liquids. Keep out of reach of children. For details on a specific product. Consult the SDS.

HAZARD IDENTIFICATION		PERSONAL PROTECTION										
Lungs Brain Skin Eyes	<p>Route of Entry: Inhalation, Eye and skin contact, Ingestion.</p> <p>Immediate Effects:</p> <ul style="list-style-type: none"> Swallowing even small amounts of diesel fuel #2 can result in serious lung damage or death (aspiration hazard). Prolonged skin exposure may cause irritation and result in absorption of hazardous components. Avoid routine skin contact. Wash exposed skin immediately following contact, and launder soiled clothing. Mists may be irritating to the nose, throat, and lungs and cause dizziness and drowsiness. <p>Long-Term Effects: Overexposure may result in skin absorption of hazardous components and skin cancer. Repeated skin contact may cause damage to the liver, blood/blood forming organs and thymus. Normal handling of diesel fuel with basic precautions is not expected and result in long-term adverse health effects. Whole diesel engine exhaust has been classified as a carcinogen by the International Agency for Research on Cancer (IARC).</p>	Safety Glasses Chemical Gloves	<p>Note: The above precautionary measures are recommended for anticipated routine product use. However, more or less protection may be warranted, depending upon the exposure situation.</p>									
HAZARD RATING												
Health Hazard	<table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> </tr> </table>	1	2	3	4	<table border="1"> <tr> <td>0 Minimal Hazard</td> </tr> <tr> <td>1 Slight Hazard</td> </tr> <tr> <td>2 Moderate Hazard</td> </tr> <tr> <td>3 Serious Hazard</td> </tr> <tr> <td>4 Severe Hazard</td> </tr> </table>	0 Minimal Hazard	1 Slight Hazard	2 Moderate Hazard	3 Serious Hazard	4 Severe Hazard	
1	2	3	4									
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1 Slight Hazard												
2 Moderate Hazard												
3 Serious Hazard												
4 Severe Hazard												
Flammability Hazard	<table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> </tr> </table>	1	2	3	4	<table border="1"> <tr> <td>0 Minimal Hazard</td> </tr> <tr> <td>1 Slight Hazard</td> </tr> <tr> <td>2 Moderate Hazard</td> </tr> <tr> <td>3 Serious Hazard</td> </tr> <tr> <td>4 Severe Hazard</td> </tr> </table>	0 Minimal Hazard	1 Slight Hazard	2 Moderate Hazard	3 Serious Hazard	4 Severe Hazard	
1	2	3	4									
0 Minimal Hazard												
1 Slight Hazard												
2 Moderate Hazard												
3 Serious Hazard												
4 Severe Hazard												
Physical Hazard	<table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> </tr> </table>	1	2	3	4	<table border="1"> <tr> <td>0 Minimal Hazard</td> </tr> <tr> <td>1 Slight Hazard</td> </tr> <tr> <td>2 Moderate Hazard</td> </tr> <tr> <td>3 Serious Hazard</td> </tr> <tr> <td>4 Severe Hazard</td> </tr> </table>	0 Minimal Hazard	1 Slight Hazard	2 Moderate Hazard	3 Serious Hazard	4 Severe Hazard	
1	2	3	4									
0 Minimal Hazard												
1 Slight Hazard												
2 Moderate Hazard												
3 Serious Hazard												
4 Severe Hazard												
EMERGENCY PROCEDURES												
First Aid	Fire	Spills and leaks										
<p>If swallowed, do not induce vomiting. Get immediate medical attention. In case of eye or skin contact, immediately flush with plenty of water for several minutes. Wash skin with soap and water. Remove contaminated clothing and wash before reuse. Get medical attention if irritation persists. For inhalation overexposures, remove to fresh air. If not breathing, give artificial respiration. For breathing difficulties, administer oxygen. Get medical attention.</p>	<p>Combustible liquid and vapour. Keep away from heat and open flames. Biodiesel soaked rags may spontaneously combust if stored near combustibles. Electrostatic charge may accumulate and create a hazardous condition. Water should be used as a cooling agent only. Empty containers contain residues. Do not solder, grill, grind, or expose such containers to heat, flame, sparks, or static electricity.</p>	<p>Can cause fire and explosion. Eliminate ignition sources and ventilate area. Contain spill if possible, using precautions outlined in the SDS. Toxic to aquatic organisms and may cause long term effects in the aquatic environment. Prevent entry into sewers, drains and waterways. Use inert absorbent to cover and remove spilled material. Check with local authorities for approved disposal of diesel fuel #2 or contaminated materials.</p>										

Diesel product safety guide | August 2021

©AstronEnergy2021 2

MSDS'S AVAILABLE ON SITE

PROOF OF HAZARDOUS WASTE DISPOSAL

AFRICAN GREEN OIL

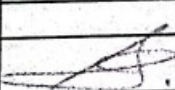
Every drop counts

Cape Town Branch: 021 591 2568 / 071 947 4227
Port Elizabeth Branch: 082 780 9770

COLLECTION

4538

CERTIFICATE OF SAFE DISPOSAL

GENERATOR:	ELVIS
PHYSICAL ADDRESS:	@ AGO
MUNICIPALITY:	CPT
PROVINCE:	WC
TELEPHONE NUMBER:	
DATE:	21.12.21
Lube:	210 ltr @ 6% = 197,4
HFO:	920 ltr @ 7% = 852,6
Diesel:	021 ltr @ 8% = 942,1
Water:	
Slops:	
Other:	
REMOVED	
DRIVERS NAME	
DRIVERS SIGNATURE	
GENERATOR'S VAT NO:	
GENERATOR CONTACT:	
GENERATOR SIGNATURE:	

African Green Oil is committed to ensure safe transport, storage and disposal of all waste oil purchased in an environmental sound manner.
This certificate is issued on condition that the disposer (generator) makes a full disclosure of the source, nature and chemical composition of what is collected.

**THIS DOCUMENT ALSO SERVES AS A VAT INVOICE.
ONCE DULY COMPLETED.**



PROOF OF SILVERLEAF TOILET SERVICES

Silverleaf Portable Toilets and Hiring Services (Pty)Ltd

INVOICE



Invoice No	0577
Date	27 August 2025
Rental period	Monthly
Collection Date	As indicated by client
VAT Reg	4460303383
Company Reg	2021/327452/07

Unit A, 24 Schoonspruit Road,
Malmesbury 7300
Tel: 0840252000 Office: (022) 4864446
Email: hire@silverleafwc.co.za
Website: www.silverleafwc.co.za

To:

Cloete Sand Aggregate
187 High Road Bredell/Augustyn
Jack Russel Farm
VAT: 4890310255

Qty	Type / Description	Unit Price (R)	Amount (R)
1.00	Chemical Portable Toilets & Urinal / hand sanitizer	1 350.00 (per unit)	1 350.00
1.00	Transport: delivery and collection	00.00	00.00
Amount Due (R)			
Sub Total			R 1 350.00
V.A.T			R 202.50
TOTAL			R 1 552.50

All Payments must be done via EFT:

Silverleaf Portable Toilets and Hiring Services (PTY) LTD
Bank: Standard Bank
Account Type: Business Current Account
Account number: 10143463738
Branch code: 000205 Branch code: 051001 (electronic payments)

APPENDIX A

Zoe Norval

From: Zoe Norval
Sent: Monday, 22 September 2025 12:04
To: Zoe Norval
Subject: FW: Request for Relaxation of a Prescription of the EMP
Attachments: Nkulu Resources DMRE Ref (WC) 30_5_1_2_2_360DMR.pdf

From: Kgomotso Modise <kgomotso@nkulures.co.za>
Sent: Tuesday, 15 April 2025 14:14
To: 'Linda.njemla@dmre.gov.za' <Linda.njemla@dmre.gov.za>; 'Pieter.swart@dmre.gov.za' <Pieter.swart@dmre.gov.za>
Cc: 'Craig Donald' <craig@siteplan.co.za>
Subject: Request for Relaxation of a Prescription of the EMP

Good Day Ms Linda Njemla

Please find attached.

We hope it receives your favourable consideration and look forward to your feedback.

Many thanks and kind regards,

Kgomotso Modise
Director
Mobile: 067 035 8142
Email: kgomotso@nkulures.co.za

