

**VAALPLAAT BORROW PIT  
PORTION 1 OF THE FARM GROOT  
EERSTEGELUK NO 2884, BLOEMFONTEIN  
FREE STATE PROVINCE**

**ENVIRONMENTAL PERFORMANCE ASSESSMENT**

<b>DMRE REFERENCE NUMBER:</b>	<b>FS 30/5/1/3/2/10144 MP</b>
<b>AUDIT PERIOD:</b>	<b>June 2025</b>

**PREPARED FOR:**

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**PREPARED BY:**

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**1. PROJECT SPECIFIC DETAIL**

ITEM	MINING PERMIT HOLDER
<b>Company Name</b>	Raubex Infra (Pty) Ltd
<b>Contact Person</b>	Mr. Kerwin Hendriks
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ITEM	CONSULTANT DETAIL
<b>Company Name</b>	Greenmined Environmental (Pty) Ltd
<b>Contact Person</b>	Ms. Christine Fouché
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<b>Postal Address</b>	Postnet Suite 62 Private Bag x15 Somerset West 7129
ITEM	LOCATION AND AREA INFORMATION
<b>Site Name</b>	Vaalplaat Borrow Pit
<b>Property Description</b>	Portion 1 of the farm Groot Eerstegeluk No 2884
<b>Location</b>	The site is in the proximity of the R702 towards Dewetsdorp, ±35 km south-east of Bloemfontein.
<b>Size of Mining Area</b>	5 ha



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## ENVIRONMENTAL PERFORMANCE ASSESSMENT VAALPLAAT BORROW PIT

### **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 mine with the Environmental Management Programme Report (EMPR) and Environmental Authorisation (EA) as approved by the Department of Mineral Resources and Energy.

#### **INSPECTED AREAS:**

The inspection included an assessment of the mining footprint.

To establish the environmental compliance assessment of the operation, the mining site was inspected by the Environmental Control Officer, Christine Fouché, of Greenmined Environmental accompanied by representatives of the permit holder.


### **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.

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### LOCATION

<b>Site Location</b>	The borrow pit is located ±35 km south-east of Bloemfontein, in the proximity of the R702 driving to Dewetsdorp.	
<b>Site Map</b>		
<b>Site Coordinates</b>	<b>5 HA AREA</b>	
	A 29°22'45.17"S	26°23'13.34"E
	B 29°22'37.53"S	26°23'18.24"E
	C 29°22'40.87"S	26°23'25.03"E
	D 29°22'48.52"S	26°23'20.13"E

### PROJECT DESCRIPTION

The Vaalplaat borrow pit entails the mining of dolerite from Portion 1 of the farm Groot Eerstegeluk No 2884, in the Bloemfontein magisterial district. The Permit Holder used excavation machinery to directly remove the dolerite from the site. No drilling, blasting, or processing (other than screening) was required on site. The dolerite, removed from the mine, was screened if needed, and then stockpiled on site until transported via trucks to construction sites. Initially it was proposed that the material will be needed as bedding material for the 35 km water pipeline project of Bloem Water. However, in the end the water pipeline project was awarded to another contractor, and the Vaalplaat dolerite was used at other construction projects of the permit holder.

Mining commenced in May 2022 and continued until October 2022 upon which mining ceased temporarily. The Permit Holder removed previously stockpiled material between May 2023 and April 2024. No mining took place between April 2024 and June 2025.

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**SITE CONDITIONS**

Sunny windless day with dry soil conditions.

**REPORTABLE ENVIRONMENTAL INCIDENTS**

<b>Incident Date:</b>	No incidents occurred during the audit period (April 2024 – June 2025).
<b>Incident No:</b>	
<b>Incident:</b>	
<b>How addressed:</b>	
<b>When addressed:</b>	

**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	<b>LOW</b> – Mitigation not needed / mitigation measures to be maintained
2	<b>MEDIUM</b> – Mitigation should be considered
3	<b>HIGH</b> – Mitigation compulsory

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**INSPECTION ASPECTS**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
<b>LEGISLATION COMPLIANCE:</b>				
National Environmental Management Act, 1998 (Act No 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended)	5	-	Addressed with DMRE	<ul style="list-style-type: none"> <li>The mine has a valid EA issued in April 2016.</li> <li>The mining footprint extends beyond the GPS coordinates listed in the EMPR. However, the matter was discussed with DMRE in 2024 an amended Regulation 2.2 Mine Plan was submitted. DMRE does not require further action from the EA Holder. See General Report.</li> </ul>
Copy of the EA and EMPR available on site	N/A	-	-	Mining ceased, and therefore the project documents are kept at the Holders main offices.
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002)	5	-	Addressed with DMRE	<ul style="list-style-type: none"> <li>The mine has a valid MP issued in April 2016.</li> <li>See earlier comment regarding the mining footprint.</li> </ul>
Mining permit available on site	N/A	-	-	Mining ceased, and therefore the project documents are kept at the Holders main offices.
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004)	N/A	-	-	The project does not trigger the NEM:AQA.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	N/A	-	-	No waste was generated during the audit period.
National Water Act, 1998 (Act 36 of 1998)	5	-	Compliant	The permit holder has a General Authorisation issued by the DWS.
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	5	-	Ongoing	At the time of the inspection no listed weeds/invader plants were noted on site.
Hazardous Substances Act, 1973 (Act 15 of 1973)	N/A	-	-	Mining has ceased, and all chemicals were removed from site.
<b>TOPSOIL &amp; OVERBURDEN MANAGEMENT:</b>				
Topsoil stripping	N/A	-	-	No topsoil was removed during the audit period.
Topsoil storage/stockpiling	N/A	-	-	
Overburden stripped & stockpiled	N/A	-	-	No overburden was stripped during the audit period.

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Topsoil returned to rehabilitated area	5	-	Compliant	The permit holder returned the stockpiled topsoil to ±0.7 ha of the excavation. The remaining part of the excavation and stockpile area will still be landscaped.
<b>VEGETATION:</b>				
Protected plants (if any) sheltered from mining activities	5	-	Compliant	The White Stinkwood ( <i>Celtis africana</i> ) tree is still on site.
Aliens & weeds controlled on site	5	-	Compliant	-
Indigenous grassmix used to rehabilitate	N/A	-	-	The permit holder will seed the rehabilitated areas if needed once the final landscaping was done.
Recent vegetated areas protected against grazing.	5	-	Compliant	The fence protects the vegetation that established through succession.
No unauthorised collection of firewood	5	-	Compliant	-
No mining within 32 m of the wetland	N/A	-	-	No mining occurred during the audit period.
<b>FAUNA:</b>				
All animals, birds and reptiles protected on site	5	-	Compliant	-
Operation pits providing an escape route for trapped animals	5	-	Compliant	-
Operational areas daily inspected for signs of trapped animals	N/A	-	-	The area is safe for animals and isn't inspected daily as mining activities ceased temporarily.
<b>AIR QUALITY &amp; NOISE:</b>				
Dust suppression implemented	N/A	-	-	As the site closed temporarily, dust suppression isn't currently needed.
Speed of vehicles controlled to lessen dust generation and road deterioration	N/A	-	-	
Noise control	N/A	-	-	No operations on site.
Hearing protection available to employees	N/A	-	-	To be confirmed when employees return to site.
Mining equipment serviced regularly to ensure noise emissions are minimized	N/A	-	-	To be confirmed when mining equipment return to site.
Operation hours restricted to office hours.	N/A	-	-	No mining took place during the audit period.
<b>ARCHAEOLOGICAL AND CULTURAL INTEREST:</b>				
Archaeological and/or cultural remnants protected.	N/A	-	-	To date no archaeological or cultural remnants were discovered at the mine.

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
<b>SURFACE WATER:</b>				
Storm water diverted around the stockpiled area and access roads to prevent erosion	5	-	Compliant	No serious erosion problems were noted at the time of the inspection.
Vehicle repairs contained to workshop, or drip trays used during emergency break downs	N/A	-	-	No vehicle repairs occurred on site during the audit period.
Areas with erosion reinstated	N/A	-	-	No serious erosion problems were noted at the time of the inspection.
<b>VISUAL EXPOSURE:</b>				
Is the contractor implementing good visual and housekeeping standards.	5	-	Compliant	At the time of the inspection the site was neat and well managed.
Open pits progressively backfilled and made safe	5	-	Compliant	The permit holder reinstating ±0.7 ha of the excavation.
<b>MANAGEMENT OF FUEL AND HAZARDOUS PRODUCTS:</b>				
Hazardous material stored within a bunded area (110% capacity)	N/A	-	-	No hazardous materials are stored on site.
Management of fuel and oil spills	N/A	-	-	
Drip trays present when refuelling is done outside the service bay	N/A	-	-	No machinery left on site.
Mining equipment mechanically sound without visible oil leaks	N/A	-	-	
Complete oil spill kit available on site	N/A	-	-	No longer applicable as mining ceased temporarily.
Material safety data sheets (MSDS) available on site	N/A	-	-	Not applicable as no chemicals are stored on site.
<b>WASTE MANAGEMENT:</b>				
Site free of day-to-day litter	5	-	Compliant	-
Waste collected in sealable containers	N/A	-	-	No waste was generated during the audit period.
General waste dumped at a recognised landfill site	N/A	-	-	
Hazardous waste removed by a registered waste handling contractor	N/A	-	-	
Hydrocarbon spills cleaned from site	N/A	-	-	At the time of the inspection there were no spills.
Spillages not disposed of into the environment, ditches, drains or water courses	5	-	Compliant	-

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Waste disposal permits on site	N/A	-	-	No waste was generated during the audit period.
No waste stockpile area allowed outside the boundaries of the mining area	5	-	Compliant	-
Proper sanitation facilities available to employees.	N/A	-	-	No longer applicable as the employees left the site.
<b>FIRE MANAGEMENT:</b>				
Firefighting equipment available on-site	N/A	-	-	No longer applicable as the site is temporarily closed.
Fires contained to facilities specially constructed for the purpose	N/A	-	-	
Employees trained in firefighting	N/A	-	-	
Combustibles kept away from fuel storage receptacles	N/A	-	-	
Vegetation in vicinity of fuel storage removed	N/A	-	-	No fuel is stored on site.
Major fires or explosions reported.	N/A	-	-	No fire/explosion occurred during the audit period.
<b>MINE &amp; EQUIPMENT MANAGEMENT:</b>				
Mining area demarcated with visible beacons	5	-	Addressed with DMRE	The mining area is fenced.
Mining contained to designated mining area	5	-	Addressed with DMRE	-
Unnecessary surface disturbance avoided	5	-	Compliant	-
Progressive rehabilitation of mined out areas	5	-	Compliant	-
Gates and fences erected/maintained in consultation with landowner	5	-	Compliant	-
ECO appointed and contact details sent to the DMRE within 30 days of commencement.	4	1	Addressed	The contact details of the ECO were sent to the DMRE during the audit period. Although this was not within 30 days of commencement, this matter was addressed in 2023.
Annual EAR and calculation of the environmental liabilities submitted to DMRE.	5	-	Compliant	The previous EAR and calculation of the environmental liabilities were submitted with the renewal application to the DMRE in April 2024.
<b>ACCESS ROADS, VEHICLES &amp; TRANSPORTING OF MATERIAL:</b>				
Existing roads used and access road maintained.	5	-	Compliant	-

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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	-
<b>EMPLOYEE AND SAFETY MANAGEMENT:</b>				
Workers inducted and informed of EMPr conditions	5	-	Compliant	The workers that initially worked at the mine were inducted and proof of training is available.
Proof of training available	5	-	Compliant	
Workers daily transported to site	N/A	-	-	-
Workers provided with PPE	N/A	-	-	No workers on site.
Are there signs present, indicating the mining site and speed restrictions (in 3 languages)	5	-	Compliant	The site has numerous warning signs displayed and access to the site is controlled through two locked gates. Therefore, even though the signs aren't in three languages, it is deemed sufficient for this site.
Effective access control to prevent unauthorised entry.	5	-	Compliant	-
Haul roads clearly marked and signposted and vehicles and machinery restricted to areas outside the wetland/wet areas.	5	-	Compliant	The access road to the site is visible and the vehicles did not have to cross the wetland. Presently, signage has been removed from site as the mine is temporarily closed.
Emergency Preparedness Plan and register available on site.	N/A	-	-	As mining has ceased temporarily, the documents were removed from site. The site must however ensure that the Emergency Preparedness Plan complies with the requirements of the EA when work recommence.

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**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):**

<b>Date of previous EAR/EPA:</b>	03 April 2024
<b>Proof of submission to DMRE available:</b>	The 2024 EAR was submitted with the permit renewal application to the DMRE, and proof of submission is available at Greenmined Environmental (Pty) Ltd.
<b>EAR/EPA compiled by independent person with environmental auditing expertise:</b>	The 2025 EAR/EPA is compiled by Greenmined Environmental (Pty) Ltd.
<b>Potential and registered I&amp;AP's notified within 7 days of the submission date, and report available on publicly accessible website</b>	N/A

**GENERAL REPORT**

Compliance of the mining site with the EMPR (2016) and the EA was reviewed during the site assessment. The mining area recorded a compliance score of 99% for the audit period (4% increase since 2023).

**Audit Period:**

No mining activities were conducted during the audit period. Due to the substantial rainfall received in the area, the previously disturbed or altered areas are now well vegetated with grass. Approximately 0.7 hectares of the excavated area have been successfully rehabilitated, exhibiting good shaping and a well-established grass cover. It is therefore recommended that this rehabilitated portion be excluded from future mining activities. Should mining resume, extraction should be limited to the remaining 0.8 hectares of the excavation area.

At the time of the site inspection, no listed invasive plant species, as defined by the NEM:BA Alien and Invasive Species Regulations (2015), were observed. The remaining White Stinkwood tree (*Celtis africana*) is still intact. The site is well maintained, and no issues of concern were identified during the inspection.

**MATTERS TO BE ADDRESSED:**

No outstanding matters were identified.

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

The BAR & EMPR adequately manage and/or mitigate environmental impacts at the mining area, and the GPS coordinates indicating the mining footprint was amended on the 2024 Regulation 2.2 Mine Plan.

**NEED FOR AMENDMENT OF THE EMPR:**

The DMRE approved the first and second renewals of the mining permit and requested an amended Regulation 2.2 Mine Plan to address the mining footprint matter. The Mine Plan was submitted to the Department in March 2024 and no amendment of the EMPR was required. In the EAP's opinion the EMPR adequately manages the environmental impacts and no amendment is needed.

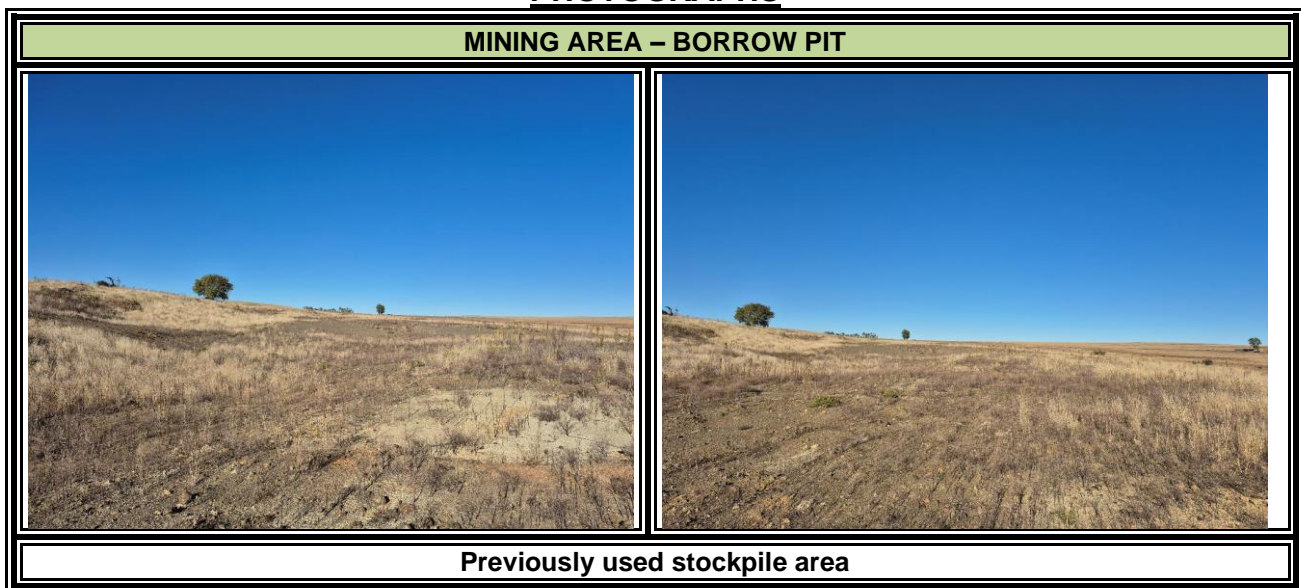
**FINANCIAL PROVISION:**

The previous financial provision calculations regarding this project, were undertaken in April 2024. This report is accompanied by a new financial provision calculation for the year 2025 that amounts to R 128 383.27. The 2025 financial provision amount does not exceed the financial guarantee lodged with the DMRE, and the Permit Holder does not have to provide a shortfall.

**ECO SIGNATURE**

NAME:	SIGNATURE:	DATE:
Christine Fouché	<i>Christine Fouché</i>	04 June 2025

**PHOTOGRAPHS**



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**MINING AREA – BORROW PIT**



**Rehabilitated  $\pm 0.7$  ha of the excavation**



**$\pm 0.8$  ha of the excavation that still require final rehabilitation**

# ENVIRONMENTAL PERFORMANCE ASSESSMENT VAALPLAAT BORROW PIT

## MINING AREA – BORROW PIT



**Access control**



**Signage at the entrance to the site**