

SAND MINING OVER A PORTION OF THE FARM NIAGARA NO 380, ELUNDINI LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE

ENVIRONMENTAL PERFORMANCE ASSESSMENT / ENVIRONMENTAL AUDIT REPORT

DMPR REFERENCE NUMBER:	EC 30/5/1/3/2/10749 MP
AUDIT PERIOD:	FEBRUARY 2025 – JANUARY 2026

Prepared For:

World Focus 1143 CC
P.O. Box No 331
Maclear / Nqanqarhu
5480
Contact Person: Mr M Sephton
Cell: 083 335 9707
E-mail: colm277@gmail.com

Prepared By:

Greenmined Environmental (Pty) Ltd
Unit MO1, No 106 AECI Site
Baker Square, Paardevlei
De Beers Avenue
Somerset West, 7130
Contact Person: Ms C Fouché
Tel: 021 851 2673
Cell: 082 811 8514
E-mail: christine.f@greenmined.co.za



1. PROJECT SPECIFIC DETAIL

ITEM	MINING PERMIT HOLDER	
Company Name	World Focus 1143 CC	
Contact Person	Mr. Malcolm Sephton	
Tel Number	N/A	
Cell Number	083 335 9707	
Postal Address	PO Box 331, Maclear / Nqanqarhu 5480	

ITEM	AUTHOR DETAIL	
Company Name	Greenmined Environmental (Pty) Ltd	
Contact Person	Ms. Christine Fouché	
Cell Number	082 811 8514	
E-mail Address	Christine.f@greenmined.co.za	
Postal Address	Postnet Suite 62 Private Bag x15 Somerset West 7129	

ITEM	LOCATION AND AREA INFORMATION	
Site Name	World Focus Sand Mine	
Property Description	Niagara No 380	
Location	The World Focus Sand Mine is ±20 km (driving along the R56) north-west of Maclear/Nqanqarhu on the southern bank of the Tsitsa River.	
Size of Mining Area	1.16 ha	
Entrance Coordinates	30° 57' 11.61"S	28° 27' 06.63"

TABLE OF CONTENTS

1. PROJECT SPECIFIC DETAIL	2
2. ENVIRONMENTAL PERFORMANCE ASSESSMENT / AUDIT REPORT	4
DETAIL OF AUDITOR	4
SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT	5
ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE	5
LOCATION	5
PROJECT DESCRIPTION	7
SITE CONDITIONS	7
REPORTABLE ENVIRONMENTAL INCIDENTS	7
ADOPTED METHODOLOGY	7
INSPECTION ASPECTS	8
COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S	29
AUDITING OF EMP AND REPORTING THEREOF	29
GENERAL REPORT:	30
ECO signature:	31
PHOTOGRAPHS:	32

2. ENVIRONMENTAL PERFORMANCE ASSESSMENT / AUDIT REPORT

PERMIT NUMBER	EC 30/5/1/3/2/10749 MP	DATE OF COMMENCEMENT	2024
SITE NAME	World Focus Sand Mine	INSPECTION DATE	16 January 2026
PERMIT HOLDER	World Focus 1143 CC	OTHER AUTHORISATIONS	Water Use Licence: 27/2/2/T435/9/1; WU28281
REPORT NUMBER	EPA 02		

DETAIL OF AUDITOR

(APPENDIX 7 SUB-REGULATION 3(A) & (B))

ECO:	Christine Fouché
EXPERTISE:	Ms Fouché holds a Diploma in Nature Conservation and a Bachelor of Science degree in Botany and Zoology and has twenty years of professional experience in environmental impact assessment and compliance monitoring within South Africa.
DECLARATION OF INDEPENDENCE:	<p>I Christine Fouché 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 (as amended). <p><i>Christine Fouché</i></p> <p>Signature of ECO Date: 22 January 2026</p>

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). The audit aspects of this EPA focussed specifically on Table 38 of the EMPR, and the conditions of the Environmental Authorisation.

OBJECTIVE:

The objective of the performance assessment audit is to evaluate compliance of the operational activities with the Environmental Management Programme (EMPR) and Environmental Authorisation (EA) approved by the DMPP for the World Focus Sand Mine. Further thereto it is to evaluate the effectiveness of the EMPR, identify shortcomings, and discern the need for changes to the environmental management programme.

INSPECTED AREAS:

The inspection included an assessment of the operational mining area.

To establish the environmental compliance of the operation, the mining site was inspected on foot by the Environmental Control Officer, Christine Fouché of Greenmined accompanied by the mine’s ECO and Permit Holder Mr Malcolm Sephton.

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

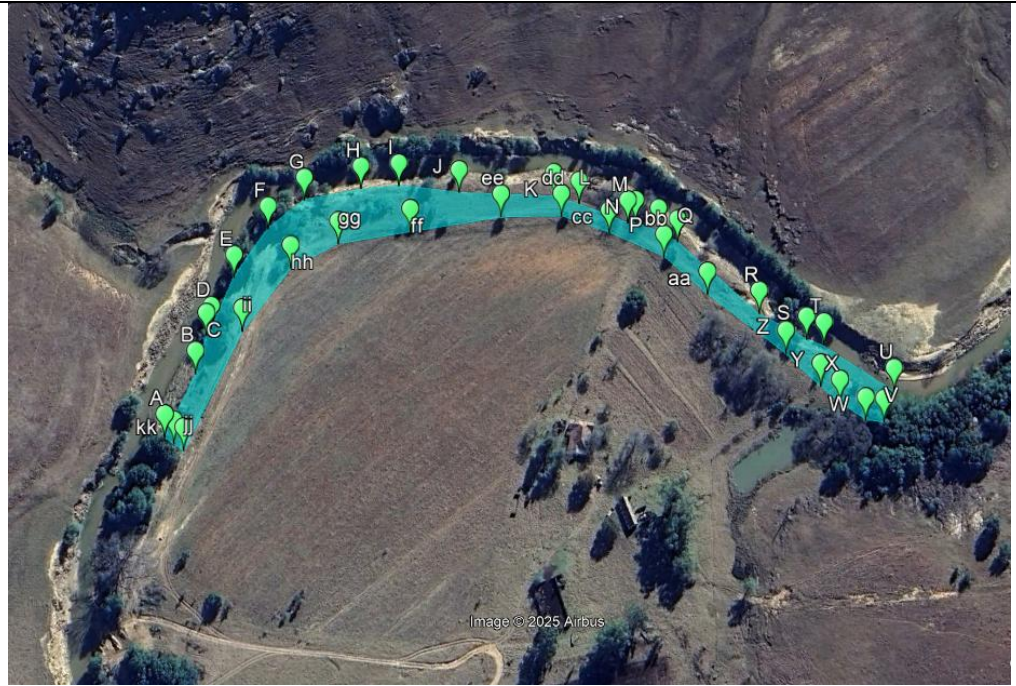
The assumptions made in this document, stem from specific information gathered during the site audit and background information provided by site management. This audit did not consider health and safety aspects and was not intended as a legal assessment.

LOCATION

SITE LOCATION

The World Focus Sand Mine is ±20 km (driving along the R56) north-west of Maclear/Nqanqarhu on the southern bank of the Tsitsa River.

SITE MAP



**SITE
COORDINATES**

A	30°56'44.87"	28°26'29.75"
B	30°56'43.56"	28°26'30.43"
C	30°56'42.76"	28°26'30.65"
D	30°56'42.61"	28°26'30.76"
E	30°56'41.54"	28°26'31.27"
F	30°56'40.51"	28°26'32.08"
G	30°56'39.88"	28°26'32.94"
H	30°56'39.63"	28°26'34.32"
I	30°56'39.57"	28°26'35.26"
J	30°56'39.73"	28°26'36.75"
K	30°56'39.81"	28°26'39.07"
L	30°56'39.97"	28°26'39.70"
M	30°56'40.39"	28°26'40.88"
N	30°56'40.38"	28°26'41.07"
P	30°56'40.55"	28°26'41.64"
Q	30°56'40.78"	28°26'42.10"
R	30°56'42.30"	28°26'44.06"
S	30°56'42.84"	28°26'45.20"
T	30°56'42.95"	28°26'45.64"
U	30°56'43.91"	28°26'47.30"
V	30°56'44.56"	28°26'46.95"
W	30°56'44.52"	28°26'46.53"
X	30°56'44.16"	28°26'45.94"
Y	30°56'43.82"	28°26'45.49"
Z	30°56'43.14"	28°26'44.67"
aa	30°56'41.90"	28°26'42.81"
bb	30°56'41.11"	28°26'41.76"
cc	30°56'40.60"	28°26'40.43"
dd	30°56'40.24"	28°26'39.26"
ee	30°56'40.25"	28°26'37.78"
ff	30°56'40.57"	28°26'35.57"
gg	30°56'40.83"	28°26'33.81"
hh	30°56'41.34"	28°26'32.67"
ii	30°56'42.68"	28°26'31.54"
jj	30°56'45.14"	28°26'30.22"
kk	30°56'45.00"	28°26'29.98"

PROJECT DESCRIPTION

The approved mining footprint is 1.16 ha and extends across the riparian zone and riverbed in an area previously disturbed by informal sand mining. The operation is small in scale, with sand extracted from the riverbed and the southern bank using an excavator or TLB.

Since the previous year's audit, stockpiling of sand has commenced in order to build reserves for sale during periods of high river flow. Despite this change, the active operational mining footprint remains confined to the approximately 0.4 ha area that was opened during the 2024/2025 period.

The mining area is fenced and notice boards are displayed on site in accordance with the Environmental Authorisation. Mining activities have not yet reached the Eskom power line that crosses the river near the eastern boundary of the mining area.

SITE CONDITIONS

Cloudy day with dry soil conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date:	According to site management no incidents occurred 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

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)	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 permit available on site.	5	-	Compliant	The first renewal of the mining permit was approved by the DMPR during the audit period and the permit is valid until 17 January 2027.
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004)	N/A	-	-	Although the activities at the mine does not require an air emissions licence, the requirements of the NEM:AQA are considered on site.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	5	-	Compliant	The waste generated at the mine is fed into the municipal waste removal system and is therefore in accordance with the NEM:WA.
National Water Act, 1998 (Act 36 of 1998)	5	-	Compliant	The mine has a water use licence issued by the DWS.
Water Use Licence on site	5	-	Compliant	-
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	4	3	Being addressed	The Large Thorn-Apple (<i>Datura ferox</i>) plants that germinated within the mining footprint are listed as Category 1b invasive alien plants in terms of the NEM:BA Alien and Invasive Species List, 2020 (as amended) and must be removed. Control of this species has improved significantly since the previous year's audit, and only a small number of remaining plants still require removal.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
National Heritage Resources Act, 1999 (Act No 25 of 1999)	N/A	-	-	Not applicable as no heritage artefacts/remains were discovered to date.
Copies of Financial Provision Calculation (FP) and Annual Performance Audit (EPA) present	5	-	Compliant	These documents are available at the Permit Holders offices.
Waste register and permits for waste removal	5	-	Compliant	The Permit Holder removes the general waste generated at the mine to the municipal skips in town from where it is incorporated into the municipal waste removal system. No permits are required, and the waste disposal register is maintained on site.
Complaints Register Present	5	-	Compliant	No complaints were received during the audit period.
Environmental Awareness training.	5	-	Compliant	-
ENVIRONMENTAL MANAGEMENT PROGRAMME				
DEMARCATON OF MINING AREA (EMPR PG 187)				
Ensure beacons are in place throughout the life of the mine.	5	-	Compliant	The mining area is fenced, and the use of beacons are therefore not necessary.
VISUAL CHARACTERISTICS (EMPR PG 187)				
Ensure that the site has a neat appearance and is always kept in good condition.	5	-	Compliant	On the day of the audit the mining area was neat, and housekeeping was to standard.
Limit vegetation removal, and only strip topsoil immediately prior to the use of a specific area.	5	-	Compliant	No new areas were disturbed during the audit period and therefore no new topsoil had to be stockpiled.
Upon closure, rehabilitate the site to ensure that the visual impact on the aesthetic value of the area is reduced to the minimum.	N/A	-	-	The site did not yet enter the closure phase.
HYDROLOGY – TSITSA RIVER (EMPR PG 188)				
Do not change, the flow of the river, or dam or divert it without prior authorisation from the DWS.	5	-	Compliant	-
Ensure no activities take place without the necessary DWS approval, within a horizontal distance of 100 m from any watercourse or estuary	5	-	Compliant	-

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
or within a 500 m radius from a delineated boundary of any wetland or pan.				
Always adhere to the requirements of the water use authorisation to be obtained prior to the commencement of the mining activities.	TBC	-	-	The compliance audit of the WUL will indicate whether the mine adheres to the requirements of the licence.
Limit extraction of sand from the riverbed to low flow periods (May-October).	2	2	Ongoing	Although mining (on the day of the audit) occurred outside the typical low-flow period (May–October), river flow conditions during January were low. No mining was undertaken during high-flow events, and operations were aligned with the objective of restricting extraction to periods of low river flow.
Ensure that the extraction from the riverbed does not exceed 1 m or is deeper than the defined base layer of the river.	5	-	Compliant	Sand extraction does not extend below the defined base layer of the river.
Implement bar skimming if feasible.	N/A	-	-	Not yet feasible for the section being mined.
If possible, maintain the thalweg of the river reach being mined to prevent a flat uniform wide channel which results in thinly spread flows.	5	-	Compliant	-
Establish a single access point through the delineated vegetation zones. Create mining platforms outside the delineated zone (i.e. 2 m from the delineated bank).	1	1	No mitigation needed	There are currently three main access points into the river. Due to the longitudinal extent of the mining area along the river, the use of multiple access points has been found to be more practical than a single access point. Relying on only one access point would require the excavator to travel long distances within the river channel to reach the various sandbars. The use of multiple access points therefore reduces in-channel travel and associated disturbance within the river.
Establish erosion control such as gabions at the access point through the vegetation.	N/A	-	-	No erosion control measures have been implemented as no problem areas occur on site.
Use existing roads and establish the access to the river perpendicular to flow.	5	-	Compliant	-

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Implement temporary storm water management systems and fill preferential runoff channels with aggregate and/or logs (branches included) to dissipate flows, limiting erosion and sedimentation.	5	-	Compliant	The condition of the access road is continuously monitored and maintained in good condition. At present, no additional stormwater control measures have been required, as no erosion or stormwater-related impacts have been observed.
Place silt traps and sediment trapping berms in drainage lines around the stockpile area.	4	2	Ongoing	Although silt traps and sediment trapping berms have not been installed, inspections indicate that no drainage lines or sediment runoff pathways occur around the stockpile area at present. The need for such measures will be reviewed following significant rainfall events.
Keep the footprint area to a minimum. Clearly demarcate the footprint area to avoid unnecessary disturbances to adjacent areas.	5	-	Compliant	The mining footprint is small and fenced.
Ensure that the contractors used for the project have spill kits available to ensure that any fuel or oil spills are clean-up and discarded correctly.	3	3	To be addressed	Although the ECO has access to a spill kit, it is suggested that the kit be brought nearer to the mine where it can be used in an emergency. As the spill kit may be stolen when placed at the mine, it is suggested that it be kept in the nearby house where the worker's ablutions are.
Inspect all machinery and equipment regularly for faults and possible leaks and have drip trays to contain oil leakage. All services must be off-site.	5	-	Compliant	-
Provide adequate sanitary facilities and ablutions to all personnel throughout the construction site. Enforce the use of these facilities.	5	-	Compliant	The employee/s have access to a nearby flush toilet.
Adequately manage all solid waste generated on-site during construction and operation. Encourage separation and recycling of different waste materials.	5	-	Compliant	The solid waste generated on site is incorporated into the municipal waste handling system.
Keep stockpiles of the sand resource outside the delineated buffer zone (10 m).	4	1	Ongoing	Stockpiles are currently located within the approved mining area, as placement outside the 10 m delineated buffer zone would fall beyond the permitted mining

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
				footprint and is therefore not practical. All stockpiles are, however, positioned outside the active river channel and are set back from flowing water. This approach ensures that in-channel disturbance is avoided and that the risk of sediment entering the river is minimised.
Rehabilitate access routes and other infrastructure areas upon closure of the site.	N/A	-	-	Not yet applicable.
Do not mine any floodplain areas (if present), to avoid floodplain ponding.	5	-	Compliant	No floodplain ponding was observed during the audit.
Implement bi-annual (high and low flow) aquatic biomonitoring.	1	3	To be addressed	Bi-annual aquatic biomonitoring must be implemented on site.
Do not store any chemicals within the mining area (operational phase).	5	-	Compliant	No chemicals are stored in the mining area.
Upon closure, remove all mining related equipment/machinery from the mining area.	N/A	-	-	Not yet applicable.
GROUNDCOVER (EMPR PG 190)				
Implement an invasive plant species management plan to control all invasive plant species on site in terms of NEM:BA, 2004 and CARA, 1983.	4	3	To be addressed	As noted previously, control of Large Thorn-Apple (<i>Datura ferox</i>) has improved significantly, and only a small number of remaining plants still need to be removed from the mining area.
Do not allow planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose.	N/A	-	-	Not yet applicable.
Keep all stockpiles (topsoil) free of invasive plant species.	5	-	Compliant	-
Control declared invader or exotic species on the rehabilitated areas.	N/A	-	-	Not yet applicable.
AIR QUALITY (EMPR PG 190)				
Control the liberation of dust into the surrounding environment using; inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB's (e.g. DAS products).	N/A	-	-	

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.	N/A	-	-	According to the Permit Holder, the dust level of the roads have been low, and no dust suppression was needed at the mine yet.
Limit speed on the haul roads to 40 km/h to prevent the generation of excess dust.	5	-	Compliant	The alignment and size of the road do not allow speeding.
Minimise areas devoid of vegetation.	5	-	Compliant	-
Flatten and cover loads to prevent spillage and windblown dust during transportation.	5	-	Compliant	The Permit Holder confirmed this is done.
Take weather conditions into consideration upon commencement of daily operations. Limit operations during very windy periods to reduce airborne dust and resulting impacts.	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	-
NOISE AMBIANCE (EMPR PG 191)				
Ensure that employees and staff conduct themselves in an acceptable manner while on site.	5	-	Compliant	This appeared true on the day of the audit.
No loud music may be permitted 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	-
Implement best practice measures to minimise potential noise impacts.	5	-	Compliant	-
Restrict work hours from 07:00 to 18:00 Monday to Saturday. Do not allow work on Sundays or afterhours.	5	-	Compliant	-
WASTE MANAGEMENT (EMPR PG 192)				
Ensure regular vehicle maintenance, repairs and services only take place at an off-site workshop and service area. Ensure drip trays are present if emergency repairs are needed on equipment not able to	5	-	Compliant	All services take place off-site, and no repairs were needed at the mine to date.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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. Treat this as hazardous waste and dispose of it at a registered hazardous waste handling facility, alternatively arrange collection by a registered hazardous waste handling contractor. File safe disposal certificates for auditing purposes. Do not repair any machinery/vehicles in the riverbed.				
If a diesel bowser is used on site, always equip it with a drip tray. Use drip trays during each refuelling event. The nozzle of the bowser needs to rest in a sleeve to prevent dripping after refuelling.	5	-	Compliant	The diesel bowser was equipped with a drip tray on the day of the audit.
Ensure drip trays are cleaned after each use. Do not allow dirty drip trays to be used on site. Dispose of dirty rags used to clean the drip trays as hazardous waste into a designated bin at the workshop, where it is incorporated into the hazardous waste removal system.	5	-	Compliant	The drip tray was clean on the day of the audit.
Collect any effluents containing oil, grease or other industrial substances in a suitable receptacle and remove it from the site, either for resale or for appropriate disposal at a registered facility. File proof.	N/A	-	-	According to site management none were generated yet.
Do not discharge water containing waste into the natural environment.	5	-	Compliant	-
Obtain an oil spill kit and train the employees in the emergency procedures to follow when a spill occurs as well as the application of the spill kit.	1	3	To be addressed	-
Clean spills immediately, within two hours of occurrence, by removing the spillage together with the polluted soil and containing it in a designated hazardous waste bin until it is disposed of at a registered facility. File proof.	N/A	-	-	According to the Permit Holder no spills occurred during the audit period that had to be cleaned.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Ensure suitable covered receptacles are always available and conveniently placed for the disposal of general waste.	5	-	Compliant	-
Store biodegradable and non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., in a container with a closable lid at a collecting point to be collected at least once a month and disposed of at a registered landfill site. Take specific precautions to prevent refuse from being dumped on or in the vicinity of the mine area. File proof of disposal.	5	-	Compliant	-
Encourage re-use or recycling of waste products.	N/A	-	-	No waste has been generated that could be re-used/recycled.
Do not bury or burn waste on the site.	5	-	Compliant	-
Provide ablution facilities in the form of a chemical toilet/s. Anchor and place the chemical toilet outside the 1:100 year floodline of the river and arrange that it is serviced at least once a week for the duration of the mining activities by a registered liquid waste handling contractor. Submit a letter of agreement between the Applicant and concerned local municipality to the DWS. File the safe disposal certificates.	5	-	Compliant	The employee/s have access to a flush toilet that drains into a closed-system septic tank.
Ensure that the use of any temporary, chemical toilet facilities do not cause any pollution to water sources or pose a health hazard. In addition, ensure that no form of secondary pollution arise from the disposal of refuse or sewage from the temporary, chemical toilets. Address any pollution problems arising from the above immediately.	N/A	-	-	No chemical toilets are used on site.
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 spills occurred.
In the event of a spill take the following steps: <ul style="list-style-type: none"> Stop the source of the spill, Contain the spill, 	N/A	-	-	

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
<ul style="list-style-type: none"> Report the spill to the DWS and other relevant authorities, Remove the spilled product for treatment and authorised disposal, Determined if there is any soil, groundwater, or other environmental impact, If necessary, take remedial action in consultation with the DWS, Document the incident. 				
Implement the use of waste registers to keep record of the waste generated and removed from the mining area.	5	-	Compliant	-
EXISTING INFRASTRUCTURE – POWER LINE (EMPR PG 195)				
Maintain an adequate no-go buffer (minimum 10 m) around the power line as per Eskom standard.	5	-	Compliant	No mining commenced within 10 m of the power line.
Immediately, (within the first hour of occurrence) inform Eskom should the line be damaged.	N/A	-	-	-
CULTURAL AND HERITAGE ENVIRONMENT (EMPR PG 195)				
Confine all mining to the development footprint area.	5	-	Compliant	-
Implement a change find procedure when discoveries are made on site.	N/A	-	-	No discoveries were made to date.
Implement the procedure in the EMPR if fossils are seen on the surface and when excavations commence.	N/A	-	-	No fossils were discovered during the audit period.
EXISTING INFRASTRUCTURE – ROADS (EMPR PG 198)				
Divert stormwater around the access road to prevent erosion.	5	-	Compliant	-
Restrict vehicular movement to the existing access road to prevent crisscrossing of tracks through undisturbed areas.	5	-	Compliant	-
Ensure that the access to the river is perpendicular to the flow.	5	-	Compliant	-
Repair rutting and erosion of the access road caused as a direct result of the mining activities.	5	-	Compliant	The road is frequently upgraded.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Prevent the overloading of the trucks and file proof of load weights for auditing purposes.	5	-	Compliant	-
Restrict the speed of all mining equipment/vehicles to 40 km/h on the access roads.	5	-	Compliant	-
Rehabilitate the access points into the river once the mine is closed.	N/A	-	-	Not yet applicable.
HYDROLOGY – EROSION (EMPR PG 198)				
Control drainage to ensure that runoff from the mining area (riverbank/riparian area) does not culminate in off-site pollution, flooding or result in damage to properties downstream or storm water discharge points.	5	-	Compliant	-
Divert storm water around the topsoil heaps and stockpiles to prevent erosion.	N/A	-	-	Not yet applicable/necessary.
Establish erosion control such as gabions at the access point through the vegetation.	N/A	-	-	
Implement temporary storm water management systems and fill preferential runoff channels with aggregate and/or logs (branches included) to dissipate flows, limiting erosion and sedimentation.	N/A	-	-	
Implement silt traps and sediment trapping berms in drainage lines around the stockpile area.	N/A	-	-	
Conduct activity in terms of the Best Practice Guidelines for small-scale mining as developed by DWS.	5	-	Compliant	On the day of the audit this appeared true.
HEALTH AND SAFETY (EMPR PG 199)				
Ensure that workers have access to the correct PPE as required by law.	5	-	Compliant	-
Locate sanitary facilities within 100 m from any point of work.	N/A	-	-	Although the toilet is more than 100 m from the work area, the employees can drive to the toilet when needed.
Manage all operations in compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).	TBC	-	-	The requirements of the MHSA was not audited.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
GEOLOGY AND SOIL (EMPR PG 200)				
Strip and stockpile the upper 300 mm of the soil (on the riverbank).	N/A	-	-	No new areas were opened during the audit period.
Carefully manage and conserve the topsoil throughout the stockpiling and rehabilitation process.	5	-	Compliant	-
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.	5	-	Compliant	-
Place 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. Establishment of plants on the stockpiles will help prevent erosion.	5	-	Compliant	Vegetation has begun to germinate on the topsoil heap.
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 stockpiles free of invasive plant species.	5	-	Compliant	-
Divert storm- and runoff water around the stockpile area to prevent erosion.	N/A	-	-	No erosion concerns were identified during the audit.
Spread the topsoil evenly over the rehabilitated area (riverbank), to a depth of 300 mm, upon closure of the site.	N/A	-	-	Not yet applicable.
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	-	-	Not yet applicable.
Plant and irrigate an indigenous grass layer immediately after spreading topsoil to stabilise the soil and protect it from erosion. Fertilise the grass layer for optimum biomass production. Rehabilitation extends until the first layer of grass is well established.	N/A	-	-	Not yet applicable.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement.	N/A	-	-	Not yet applicable.
TERRESTRIAL BIODIVERSITY, CONSERVATION AND GROUNDCOVER (EMPR PG 201)				
Clearly demarcate the mining boundaries and contain all operations to the approved mining area. Declare the area outside the mining boundaries a no-go area and educate all staff accordingly.	5	-	Compliant	-
Arrange a pre-commencement environmental induction for all staff on site to ensure that basic environmental principles are adhered to. This must include awareness of no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas, etc.	5	-	Compliant	-
Only establish a single access point through the delineated vegetation zones. Once this access point has been created construct mining platforms outside of the delineated zone (i.e. 2 m from the delineated bank).	1	1	No mitigation needed	See earlier remark regarding access into/along the river.
Donate the wood from cleared vegetation to the community. Cover other plant remains with stockpiled topsoil and retain the material for future site rehabilitation purposes.	5	-	Compliant	Wood cleared from the mining footprint is removed by a community member when available.
Arrange that the ECO provide supervision and oversight of vegetation clearing activities and other activities which may cause damage to the environment, especially during the site establishment phase, when most of the vegetation clearing is taking place.	5	-	Compliant	The ECO/Permit Holder is present when vegetation removal is done.
Ensure all vehicles remain on demarcated roads and prevent unnecessary driving in the veld outside these areas.	5	-	Compliant	-
Do not translocated, uprooted, or disturbed plants for rehabilitation or other purposes without express permission from the ECO and without the relevant permits.	N/A	-	-	Not yet applicable.
Do not allow fires on-site.	5	-	Compliant	-

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Provide spoil heaps and topsoil stockpiles with a vegetation cover of indigenous grasses.	5	-	Compliant	Vegetation is in the process of establishing on some of the stockpiles.
FAUNA (EMPR PG 202)				
Ensure no fauna is caught, killed, harmed, sold, or played with.	5	-	Compliant	-
The ECO or other suitably qualified person must remove any fauna directly threatened by the operational activities to a safe location.	N/A	-	-	Not necessary during the audit period.
Arrange that all personnel undergo environmental induction 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	-
Ensure no snares are set or nests raided for eggs or young.	5	-	Compliant	-
Ensure all vehicles adhere to a low speed limit (40 km/h is recommended) to avoid collisions with susceptible species such as snakes and tortoises.	5	-	Compliant	-
Prevent litter, food or other foreign material thrown or left around the site. Keep such items in the site vehicles and daily removed it to the site camp.	5	-	Compliant	-
Only mine during the low flow period of the river (May-October) in the riverbed.	2	2	Ongoing	Refer to earlier remark regarding the low flow mining.
ENVIRONMENTAL AUTHORISATION				
SITE SPECIFIC CONDITIONS (EA PG 6)				
A water use license in terms of section 21 (C) and (I) of the NWA is required from the DWS.	5	-	Compliant	-
Mining is prohibited without the issuing of the applicable water use license.	5	-	Compliant	-
The 20 m buffer from the riverbank to where the sand will be stockpiled must be established prior to commencement of mining. Stockpiling within the riverbed and the riverbank is strictly prohibited.	4	1	Ongoing	Stockpiles are currently located within the approved mining area, as placement outside a 20 m buffer zone would fall beyond the permitted mining footprint and is

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
				therefore not practical. All stockpiles are, however, positioned outside the active river channel and are set back from flowing water. This approach ensures that in-channel disturbance is avoided and that the risk of sediment entering the river is minimised.
Blanket clearing of vegetation is prohibited. Removal of vegetation must only be done immediately prior to the use of a specific portion.	5	-	Compliant	-
A rehabilitation plan must be implemented during the operational phase of the mining activities.	5	-	Compliant	Although the mine has a Closure Plan, no rehabilitation has been possible as mining did not yet conclude on any of the denuded areas.
Erosion mitigation measures such as rock packing, gabion packing, bank restoration and revegetation must be implemented to stabilize and restore gully systems.	N/A	-	-	Not applicable during the audit period.
Shade cloth screens must cover the stockpile, topsoil and sand on site. The shade cloth must be properly attached to wooden poles (so that it does not blow) and must stretch to the ground surface.	N/A	-	-	Shade cloth screens have not been installed over the stockpiles, topsoil, or sand, as windblown dust has not been observed on site and the material is not prone to wind erosion under current conditions. In addition, the installation of shade cloth is not considered practical at this operation. Vegetation has begun to establish on the topsoil stockpile, which further stabilises the material and reduces the potential for dust generation. The stockpiles are monitored regularly, and shade cloth will be installed should dust emissions become evident.
Drainage must be controlled to ensure that runoff from the site is contained and does not culminate in offsite pollution.	5	-	Compliant	Drainage monitoring is implemented on site.
An alien eradication program must be established prior to the commencement of mining activities and must be implemented throughout the life cycle of the mine until such time when the closure certificate is issued.	5	-	Ongoing	-

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
All development footprint areas affected by the proposed development must remain as small as possible and must not encroach onto surrounding sensitive areas and the neighboring community.	5	-	Compliant	-
The necessary measures must be implemented to control dust on site, especially during windy conditions and loads transporting the mined material must be covered with hessian sheets or watered down to ensure that dust is controlled in transit.	N/A	-	-	According to site management dust suppression measures were not yet necessary.
Upon the closure of the mine site and after the period of at least a year to remove the alien species on site, the geminate as a result of the mining activities must be implemented.	N/A	-	-	Not yet applicable.
DEPARTMENTAL STANDARD CONDITIONS – COMMENCEMENT OF THE ACTIVITY (EA PG 11)				
In order to ensure safety, all the employees must be given the necessary personal protective equipment.	5	-	Compliant	-
This EA must be provided to the site operator, and the requirements thereof must be fully known to him or her.	5	-	Compliant	-
Haul roads for construction vehicles and machinery must be clearly marked and appropriate signaling must be posted in that effect. Furthermore, the movement of construction vehicles and machinery must be restricted to areas outside of the drainage line or wet areas.	5	-	Compliant	-
Appropriate notification signs must be erected at the construction site warning the public (residents, visitors, etc,) about the hazard around the construction site and presence of heavy vehicles and machinery.	5	-	Compliant	-
Construction must include design measures that allow surface and subsurface movement of water along the trench line so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of stormwater runoff.	5	-	Compliant	-

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Vegetation clearance must be limited to areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.	4	3	Ongoing	Refer to earlier comments regarding the control of alien species invasion.
The holder of the EA must know that in terms of the National Forest Act, protected plant species must not be cut, disturbed, damaged, destroyed, and their products may not be sold, possessed, collected, removed, transported, exported, donated, purchased or sold unless permission is granted by the DFFE.	5	-	Compliant	The Permit Holder is aware of this. However, to date no indigenous and/or protected trees had to be removed.
Construction areas (e.g. material lay-down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.	5	-	Compliant	-
If any soil contamination is noted at any phase of the proposed activities, the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and DWS. The opportunity for the onsite remediation and reuse of contaminated soil must be investigated prior to the disposal, and this department must be informed in this regard.	N/A	-	-	Not applicable during the audit period.
An integrated waste management approach must be implemented that is based on waste minimization and must incorporate at avoidance reduction, recycling, treat reuse and disposal where appropriate. Uncontaminated rubble generated on the premise can be reused as backfilling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited on the adjacent properties or public places and open space.	5	-	Compliant	The mine generates very small amounts of solid waste. No hazardous waste and/or rubble were generated during the audit period.
Construction vehicles must be serviced and maintained in the manner whereby no excessive smoke and noise production is reduced to acceptable levels and to prevent oil leaks. Contaminated	5	-	Compliant	All services take place off-site.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
soil must be remediated on site or removed to an authorized landfill site.				
Residents (if any) on the property and surrounding areas must be informed if any unusual noisy activities are planned.	N/A	-	-	Not applicable during the audit period.
Dust suppression measures must be implemented on all exposed surfaces to minimize and control airborne dust.	N/A	-	-	Not yet necessary.
Mixing of cement, concrete, paint, solvents, sealants and adhesives must be done in specified areas on concrete aprons or on protected plastic linings to contain spillages or overflow onto soil to avoid contamination and underground water and environmental damage.	N/A	-	-	Not applicable during the audit period.
Should any heritage remains be exposed in operations or any actions on the site, these must immediately be reported to SAHRA. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from SAHRA.	N/A	-	-	
Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.	N/A	-	-	
Hydraulic fluid or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned immediately by removing spillage together with the polluted solids and dispose it in the authorized disposal site permitted of such waste. The regional office of the DWS must be notified within 24 hours of an incident that may pollute surface and underground water resources.	N/A	-	-	Not applicable as no chemicals are stored on site.
Chemical sanitation facilities and system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills	5	-	Compliant	Refer to earlier comments regarding the ablutions of the mine.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorized wastewater treatment works.				
The holder of the EA must ensure that any water uses listed in terms of Section 21 of the NWA must get authorization from DWS prior to the commencement of such activities.	5	-	Compliant	The water uses were authorised by DWS.
The EA does not purport to absolve the holder of the EA from its common law obligations towards the owner of the surface of land affected.	5	-	Compliant	-
The holder of EA must ensure that rehabilitation of the disturbed areas caused by operations at all times complies with the approved EMPR	N/A	-	-	Not yet applicable.
The holder of EA must note that in terms of Section 43(A) of NEM:WA, residue deposits must be deposited and managed in the prescribed manner on any site demarcated for that purpose in the EMPR. No person may temporarily or permanently deposit residue stockpiles or residue deposit on any area or site other than on site indicated on the EMPR.	N/A	-	-	No residue deposits were disposed during the audit period.
The holder of EA must note in terms of Section 20 of the NEM:WA, no person may commence, undertake, or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of Section 19(3) for that activity or a waste management license is issued in respect of that activity if license is required.	5	-	Compliant	-
The waste storage site must have a firm, impermeable, chemical resistant floor and a roof to prevent direct sunlight and rainwater from getting in contact with the waste.	N/A	-	-	Not applicable as the mine only need one refuse bin that has a lid to prevent rainwater entering the bin.
The storage of hydrocarbons must have bunded walls with adequate capacity to contain the maximum volume that is stored in the area.	N/A	-	-	Not applicable for this mine as no hydrocarbons are stored on site.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Uncontaminated stormwater must be prevented from coming into contact with the waste and must be diverted away from the storage site.				
DEPARTMENTAL STANDARD CONDITIONS – MANAGEMENT OF ACTIVITY (EA PG 14)				
A copy of the EA and EMPR must be kept at property or on-site office where the activities will be undertaken.	5	-	Compliant	-
The content of the EMPR and its objectives must be made known to all contractors, subcontractors, agents and any other people working on the site, and any updates or amendments to the EMPR must be submitted to the Department for approval.	5	-	Compliant	-
Regular monitoring and maintenance of stormwater drainage facilities must be conducted at all times if damaged, as directed by the Department or any other relevant authority.	N/A	-	-	Not yet applicable for this mine.
The holder of the EA must prevent nuisance conditions or health hazards or the potential creation of nuisance conditions or health hazards.	5	-	Compliant	-
The holder of the EA must ensure that all non-recyclable waste is disposed of at waste management facilities licensed to handle such wastes and all recyclable waste are collected by licensed waste management facilities for recycling, reuse or treatment.	5	-	Compliant	-
The holder of the EA must ensure that all liquid waste, whose emissions to water or land could cause pollution, are diverted to sewer, after testing water quality and receiving written approval from the relevant local authority.	N/A	-	-	No liquid waste is generated at the mine.
Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPR.	N/A	-	-	Not yet applicable.
The holder of the EA must ensure that the name and contact details of the ECO are made available to the Regional Manager within 30 days of commencement. The holder of the EA must also ensure that	5	-	Compliant	The DMPR were informed of the name and contact details of the ECO on 08 February 2024.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
an ECO is always available on site to ensure that activities at all times comply with the issued EA and approved EMPR.				
The footprint of the activities must be limited to the areas authorized for the actual construction works and operation activities and all areas outside of the footprint must be regarded as a no-go areas.	5	-	Compliant	-
Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water runoff. When necessary, erosion stabilizing action such as guardians or revegetation must be implemented to prevent further habitat deterioration.	5	-	Compliant	-
The holder of the EA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimize the risk involved. Records of training and verification of competence must be kept by the holder of the EA	N/A	-	-	No hazardous waste generated at the mine during the audit period.
In order to prevent nuisance conditions, the holder of the EA must ensure that all storage skips and bins are not overfilled.	5	-	Compliant	-
DEPARTMENTAL STANDARD CONDITIONS – SITE SECURITY AND ACCESS CONTROL (EA PG 16)				
The holder of the EA must ensure effective access control on the site to reasonable prevent unauthorized entry. Signs indicating the risk involved in unauthorized entry must be displayed at each entrance	5	-	Compliant	-
Weatherproof, durable, and legible notices in at least three official languages applicable in the area must be displayed at each entrance to the site.	5	-	Compliant	-
DEPARTMENTAL STANDARD CONDITIONS – EMERGENCY PREPAREDNESS PLAN (EA PG 16)				
The holder of the EA must maintain and implement an environmental preparedness plan and review it annually when conducting audit and after each emergency or a major accident	5	-	Compliant	The Permit Holder has an Emergency Preparedness Plan on file.

ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT – EC 30/5/1/3/2/10748 MP
WORLD FOCUS 1143 CC

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
The holder of the EA must ensure that an up-to-date emergency register is kept during all phases of the operation. This register must be made available upon request by the Department.	5	-	Compliant	The mine has an incident register.

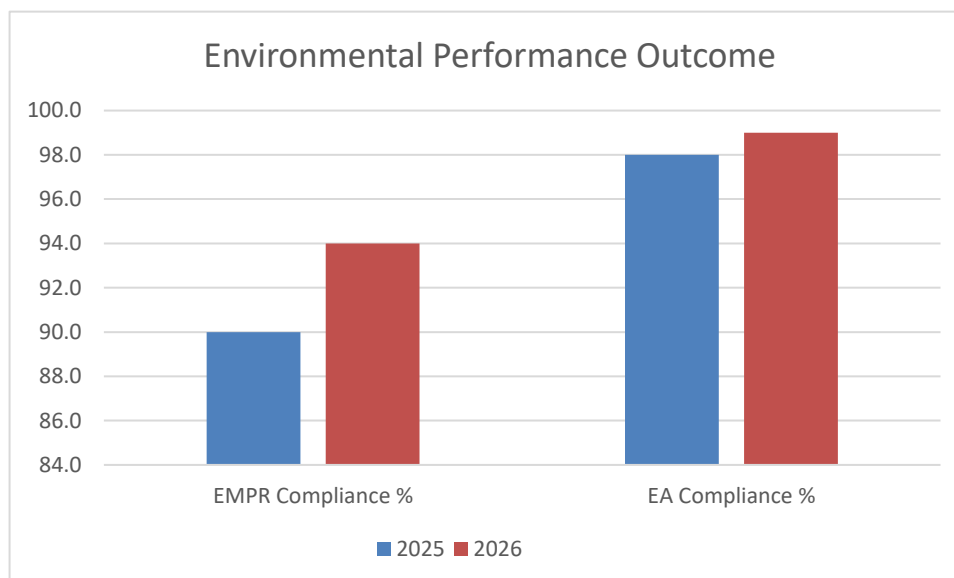
COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S
(APPENDIX 7 SUB-REGULATION 3(G) & (J))

No written comments or complaints were received during the audit period.

AUDITING OF EMP AND REPORTING THEREOF
(REGULATION 34)

Date of previous EAR/EPA:	20 March 2025
Proof of submission of previous EAR/EPA to DMPR available:	The proof of submission of the EAR/EPA is available at the Permit Holder's office.
EAR/EPA compiled by independent person with environmental auditing expertise:	This EPA was compiled by Christine Fouché (registered EAPASA EAP) of 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	The Permit Holder will within 7 days of submission notify the landowner that the EPA was submitted to the DMPR. The report will also be placed on the publicly accessible Greenmined website.

Compliance of the mining site with the EMPR and EA was reviewed during the site assessment. The mining area recorded a compliance score of 94% on the EMPR and 99% on the EA as presented in the following figure.



Based on the findings of the environmental compliance audit, the mining operation is largely compliant with the applicable environmental legislation, Environmental Authorisation (EA) conditions, and the approved Environmental Management Programme (EMPR). The audit confirms that the majority of legislative and site-specific requirements have been adequately implemented and maintained during the reporting period, with a strong overall compliance performance observed across operational, environmental, and management aspects.

Operational activities are well managed, with effective control measures in place to limit environmental disturbance. The mining footprint is clearly defined and contained, housekeeping standards are high, and waste management practices are aligned with municipal and legislative requirements. No pollution incidents, spills, or environmental complaints were recorded during the audit period, and no significant impacts on water quality, air quality, noise levels, or surrounding land uses were observed.

A limited number of non-compliances and ongoing items were identified. These relate primarily to:

- The presence of a small number of Category 1b invasive alien plants (Large Thorn-Apple *Datura ferox*) within the mining footprint;
- The need to formalise and implement bi-annual aquatic biomonitoring;
- The availability and proximity of spill response equipment on site; and
- Certain operational deviations related to river access points, stockpile positioning, and timing of in-river mining relative to the preferred low-flow period.

Importantly, these matters are being actively addressed, and in several instances the audit confirms that site-specific conditions and practical constraints have been considered, with alternative mitigation measures effectively limiting environmental risk. No significant environmental harm was identified as a result of these findings, and improvements since the previous audit were noted, particularly in invasive species control.

In conclusion, the operation demonstrates a satisfactory level of environmental performance and commitment to ongoing compliance. Provided that the identified corrective actions and monitoring requirements continue to be implemented and tracked, the mine is considered to be operating in accordance with the intent of the approved EA

and EMPR. Continued attention to adaptive management, monitoring, and record-keeping is recommended to ensure sustained compliance for the remainder of the permit period.

DOCUMENT CHECKLIST:

δ Mining Permit	-	Present
δ Approved EMPR	-	Present
δ Environmental Authorisation	-	Present
δ Environmental Performance Assessment (2025)	-	Present
δ Financial Provision Reassessment (2025)	-	Present
δ Water Use Licence	-	Present
δ Proof of Waste Removal	-	Present
δ Emergency Preparedness Plan	-	Present
δ Water Monitoring Results	-	To be obtained
δ Incident Register	-	Present
δ Complaints Register	-	Present
δ Environmental Awareness Training	-	Present
δ Proof of payload weights	-	Present
δ Closure Plan	-	Present as part of the EMPR. .

MATTERS TO BE ADDRESSED ON SITE:

- δ Remove the Thorn-Apple plants from site;
- δ Bring a spill kit to site;
- δ Implement bi-annual aquatic biomonitoring (including water quality).

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

The EMPR of the mining area currently adequately manages and/or mitigates the environmental impacts of the mining area.

NEED FOR AMENDMENT OF THE EMPR:

No need was identified for the amendment of the EMPR.

FINANCIAL PROVISION:

This report is accompanied by a reassessment of the financial provision calculation for the year 2026 that amounts to R 103 794.11. The 2026 financial provision does not exceed the value of deposit in place at the DMPR, and therefore the MP Holder does not have to provide a shortfall.

ECO SIGNATURE

NAME:	SIGNATURE:	DATE:
Christine Fouché	<i>Christine Fouché</i>	22 January 2026

PHOTOGRAPHS

PHOTOS OF THE MINING AREA



Eastern side of the operational area



Far eastern side of the operational area where problem plants need to be removed



PHOTOS OF THE MINING AREA



Mining in progress



Notice of mining area



Refuse bin and drip tray on site

PROOF OF DOCUMENTATION

WASTE REMOVAL REGISTAR			
Date	Name	Contact	Waste Removal (From Mine to Town)
8-8-25	M. Saphron		Bin emptied of bags and tubes to municipal waste disposal in town
12-5-25	M. Saphron	885-953-5757	Mine bins emptied in Mackinac municipal waste disposal
18-9-25	M. Saphron	"	Bin emptied at municipal waste
26-11-25	M. Saphron	"	Bin on mine emptied → municipal waste

Waste Removal Register

SPA Action list	Date: 28/02/2021
MP Holder: World Focus 1143 CH	Responsible Person: M. Malcolm Saghoun

Matter to be addressed	Planned Completion Date	Responsible Person	Date Completed	Signature	Comment	Proof
Remove the Thorn-Apple plants from site.	30-03-25	M. Saghoun	6-3-25			see pictures
Remove a waste removal register and take pictures when waste is removed into the municipal depot.	30-03-25	M. Saghoun	3-3-25		waste removed to municipal depot	see pic
Start all milling machinery with drip trays.	30-03-25	M. Saghoun	28-2-25		only 1st 2nd 3rd	

Implement to remove aquatic biomonitors (including water quality).

File proof of payments.	Planned Completion Date	Responsible Person	Date Completed
Ensure spend is stripped from all the areas to be treated (outside the incubator).	30-03-25	M. Saghoun	20-3-25
Use an incident register to the site fee	30-03-25	M. Saghoun	25-3-25

Proof of induction

PROOF OF DOCUMENTATION

Complaints Register

Copy of Mining Permit