

**ENVIRONMENTAL AUDIT REPORT IN TERMS OF REGULATION 34 OF THE
ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2014 PUBLISHED IN TERMS OF
THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998**

**ENVIRONMENTAL AUTHORISATION: PROPOSED ACTIVITIES FOR ESTABLISHMENT OF
UNDERGROUND MINING OPERATIONS AT AN EXISTING OPENCAST VENETIA MINE
CONDITIONS COMPLIANCE AUDIT REPORT 2020**

Reference nr.: 12/1/9/2-V9

PREPARED FOR:

DE BEERS CONSOLIDATED MINES: VENETIA MINE

2020 ENVIRONMENTAL AUTHORISATION CONDITIONS COMPLIANCE AUDIT	
Audit Team:	Project Coordinator: Liezl Sterne Mervyn Taback Incorporated
	Auditor: Erika van der Linde Aquatox Consulting Pty Ltd
Audit date:	20 – 23 September 2020
Reference number:	DEBE7.LAS4

1. INTRODUCTION

1.1 De Beers Consolidated Mines Ltd. Venetia Mine (“**DVM**”) appointed Mervyn Taback Incorporated (“**Tabacks**”), in conjunction with Aquatox Consulting Pty Ltd (referred to as the “**Audit Team**”), to undertake an Environmental Audit in terms of regulation 34 of the Environmental Impact Assessment (“**EIA**”) Regulations 2014¹ published in terms of the National Environmental Management Act 107 of 1998 (“**NEMA**”) in respect of DVM’s Environmental Authorisation (“**EA**”) granted in terms of the NEMA by the Limpopo Department: Economic Development, Environment and Tourism (“**LEDET**”) under reference. 12/1/9/2-V9 on 13 July 2012 and as amended on 5 February 2015. The Environmental Audit was undertaken in accordance with the approved Scope of Work dated 17 July 2020.

2. METHODOLOGY AND DETAILS OF THE AUDIT TEAM

2.1 Audit Methodology

2.1.1 In undertaking the Environmental Audit, the Audit Team followed the following methodology:

2.1.1.1 Audit preparations documentation and requests forms were distributed to DVM on 3 September 2020;

2.1.1.2 Due to COVID-19 restrictions and caution the assessment predominantly occurred using remote methods. The review of documentation commenced on 10 September 2020 as part of the remote assessment;

2.1.1.3 Site visit and interviews were conducted with key staff members on 22 and 23 September 2020;

2.1.1.4 Consideration of documentation provided prior to and during the site visit;

2.1.1.5 Assess the status of compliance based on observations made by the independent Audit Team during the site visit and review of the documentation provided. This activity entailed the following:

2.1.1.5.1 An assessment of the status of formal compliance at a site level. That is, determine whether required conditions have been met by the site following submission of relevant documented proof;

2.1.1.5.2 An assessment of the status of actual compliance at the site in respect of

¹ Published in GNR 982 of 4 December 2014 (as amended by GN 326 of 7 April 2017)

specific conditions set out in the EA as well as any other impacts associated with the Mine's activities on the environment;

2.1.1.5.3 Preparation of the Environmental Audit Report and distribution thereof to DVM for consideration and comments.

2.1.1.6 Once the above process has been completed the following actions were undertaken:

2.1.1.6.1 A period of two (2) weeks was granted for review of the factual correctness of the Environmental Audit Report. Once all the information was received and considered the draft Environmental Audit Report was amended, where necessary.

2.1.1.6.2 The documented final Environmental Audit Report was provided to DVM for submission to the competent authority in accordance with the requirements of regulation 34 of the EIA Regulations 2014.

2.2 Audit Team

2.2.1 Tabacks is a firm of attorneys specialising in, amongst others, environmental law. Tabacks has been appointed by DVM as the project coordinator and for purposes of the environmental-legal component of the Environmental Audit.

2.2.1 The project was coordinated and the legal component of the Environmental Audit was undertaken by Ms. Liezl Sterne, a Director at Tabacks. Liezl completed her LLB degree with the university of South Africa and was admitted as an attorney in 2011. Liezl specialises exclusively in Safety, Health and Environmental (“SHE”) law and has extensive experience in legal interpretation of statutes pertaining to SHE and administrative law and have conducted numerous SHE-legal requirements and compliance audits.

2.2.3 The technical component of the Environmental Audit was undertaken by Ms. Erika van der Linde who graduated with B.Sc, PHED, B.Ed and M.EM (Environmental Management) from the University of the Free State. After 12 years of teaching natural and applied sciences at various secondary and tertiary institutions accredited with the Department of Education, she joined Ferret Mining and Environmental Services (Pty) Ltd from April 2003 to December 2017 as an environmental scientist. In January 2018 Ms van der Linde founded Aquatox Consulting (Pty) Ltd (“**Aquatox**”). Ms van der Linde is also a registered ISO Systems auditor with TÜV SÜD, Germany and has extensive experience in the following:

- 2.2.3.1 Specialist contributions to environmental projects, including ecology and biology;
- 2.2.3.2 Compilation of Environmental Management Programme Reports, Environmental Management Plans, Environmental Impact Assessments and Environmental impact reports, Environmental Management Programme performance assessments and audits;
- 2.2.3.3 Compiling feasibility studies;
- 2.2.3.4 Environmental due diligence assessments;
- 2.2.3.5 Water use license applications and water use registration;
- 2.2.3.6 Liaison with authorities on the acquisition of mining rights and permits and prospecting rights;
- 2.2.3.7 Prospecting right, mining permit, and mining right applications;
- 2.2.3.8 Compliance evaluations and audits;
- 2.2.3.9 Development and Implementation of ISO 14001 certified Environmental Management Systems;
- 2.2.3.10 Auditing of ISO 14001 based Environmental Management Systems (audit log available on request).

2.3 Declaration of independence

- 2.3.1 Tabacks hereby declares that it is an independent legal advisor and has no business, financial, personal or other interest, except fair remuneration for the undertaking of the Environmental Audit in terms of regulation 34 of the EIA Regulations 2014 published in terms of the NEMA. Tabacks further declares that there are no known circumstances that compromised the objectivity of Tabacks in the undertaking of the Environmental Audit.
- 2.3.2 In addition to the above, Aquatox hereby declares that it is an independent environmental consultant and has no business, financial, personal or other interest, except fair remuneration for the undertaking of the Environmental Audit in terms of regulation 34 of the EIA Regulations 2014 published in terms of the NEMA. Aquatox further declares that there are no known circumstances that compromised the objectivity of Tabacks in the undertaking of the Environmental Audit.

3. PURPOSE OF THE CONDITIONS COMPLIANCE AUDIT

- 3.1 The purpose of the Environmental Audit is to determine DVM's status of compliance with the conditions set out in the EA issued under reference 12/1/9/2-V9 (as amended) as required in terms of regulation 34 read with Appendix 7 of the EIA Regulations 2014. In addition, the purpose of the Environmental Audit is to comply with condition 5.1 of the EA (as amended) which requires DVM to annually undertake an external audit in respect of the conditions of the EA.

4. ASSUMPTION AND LIMITATIONS

- 4.1 The findings recorded in this Environmental Audit Report are limited to the conditions of the EA (as amended) authorising activities undertaken in respect of the establishment of underground mining operations at DVM, including site observations made during the site visit undertaken on 22 and 23 September 2020 as well as all documents received and verified.
- 4.2 The Audit Team's findings as set out in this Environmental Audit Report have been prepared with a view of submitting same to the Competent Authority in compliance with regulation 34 of the EIA Regulations 2014.

5. ACKNOWLEDGMENTS

- 5.1 The Audit Team extends its appreciation to Ms. Ramlal, Ms. Du Plessis and Ms. Piek of DVM that provided verbal, visual or documentary assistance to the Audit Team during the audit.

6. CONDITIONS COMPLIANCE FINDINGS

- 6.1 In this section of the Report the Audit Team sets out the status of compliance in respect of the EA conditions. In the Table below reference is made to general observations made during the documentation review/assessment as well as site specific observations made during the site visit.

The following terminology is utilised throughout the Report, of which the following meanings have been assigned thereto



“Compliant” - means that satisfactory evidence was provided during the assessment to illustrate the fulfilment of a specific condition.



“Non-compliance” - means the failure to comply with or satisfy the requirements of a condition;



“Partial Compliant” - means that steps have been taken to fulfil a specific condition, but full compliance has not yet been achieved requiring the Client to

instigate further action.

- “Noted”** conditions were not audited if a condition does not require the Client to take any specific action and is therefore included in the checklist for information purposes only.

7. CONCLUSION

- 7.1 In most instances the Audit Team noted compliance with the conditions of the EA, however, the finalisation and implementation of the stormwater management plan lead to two partial-compliance findings being raised. The Audit Team further noted that the frequency of noise monitoring of all diesel-powered equipment as is required in terms of the EA conditions appears to be impractical and the mine has therefore applied for an administrative amendment to rectify the monitoring frequency.
- 7.2 Following observations made at the Decline Workshop, we are of the view that better management regarding the use, handling and storage of hazardous materials is required.
- 7.3 In instances where non-compliant findings cannot be rectified due to a lapse of time in respect of specific actions that were required, the said omissions were communicated to the relevant competent authority who advised DVM that such findings, in future, should be noted. The relevant competent authority (at the time) has accordingly been informed of these omissions and is aware of the status of compliance.

TABLE A: ENVIRONMENTAL AUTHORISATION CONDITIONS COMPLIANCE FINDINGS AND RECOMMENDATIONS

No.	Condition	Findings	Comment
1.	Scope of Authorisation		
1.1	The EA applies only to the above-mentioned activity, i.e. the establishment of underground operation at an existing open cast Venetia Mine, located on the farm Venetia 103 MS as indicated in the amended Environmental Impact Assessment Report received by the Department on 15 June 2012.		<p>Noted</p> <p>The content of this condition is noted.</p>
1.2	Amended: Should the authorised development trigger activities that are listed in Section 21 of the National Environmental Management: Air Quality Act, an Atmospheric Emission License (AEL) must be obtained prior to the commencement of such activity.		<p>Compliant:</p> <p>DVM was issued with an Atmospheric Emissions Licence, Ref. 12/4/12L-V7 in terms of Section 21 of the National Environmental Management Air Quality Act (“NEMQA”), in respect of listing notice no. 2.4 (Storage and Handling of Petroleum Products) and no. 8.3 (Burning Grounds) that are associated activities with the mining operation. No activities undertaken at the Venetia Underground Project (“VUP”) were identified during the assessment that requires an amendment of the AEL at this time.</p>
1.3	Deleted as per the amendment of the EA by LEDET dated 6/2/2015.		
1.4	The holder of the EA shall be responsible for ensuring compliance with the conditions contained in this EA. This includes any person acting on the holder’s behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the EA.		<p>Compliant:</p> <p>The content of this condition is noted.</p> <p>Strict contractor management is in place at VUP, which is overseen by a representative from DVM’s Environmental Management Team. Site specific inspections are undertaken weekly and any deviation identified</p>

		<p>is logged and followed up with corrective actions.</p> <p>During our assessment we noted that a copy of the EA is included in the contractor files and attendance registers for EA discussions were evident.</p> <p>Relevant legal requirements and site-specific procedures are also included in the Induction training.</p>
1.5	<p>Any changes to, or deviations from, the project description set out in this EA must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the EA to apply for further authorisation in terms of the Regulations.</p>	<p>Noted</p> <p>The content of this condition is noted.</p> <p>Tabacks are not aware that there has been any deviation from the project description in respect of site activities. However, it is understood that due to the nature of the project, deviation from the approved layout and design may occur throughout the construction phase. It is noted that although such deviances may occur, the authorised activities will not deviate from the approved authorisation for the construction project, and therefore the impacts associated with such variances, in essence, will not differ from that, which has already been included in the EIA and approved by the LEDET.</p> <p>Accordingly, DVM will not specifically notify LEDET if there is a deviation from the layout and design of infrastructure, but only if there has been a specific change in activity.</p> <p>It is recorded that this arrangement was agreed to in a meeting held between DVM and LEDET on 10/2/2015 and again confirmed in a letter to LEDET during July 2015.</p>
1.6	<p>This EA does not negate the holder of the EA's responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.</p>	<p>Noted</p> <p>The content of this condition is noted.</p>
1.6.1	<p>Amended to insert Mine Health and Safety Act, 1996 (Act 29 of 1996)</p> <p>Relevant legislation that must be complied with by the holder of this EA</p>	<p>In addition to various internal and external audits conducted in respect of environmental aspects, including but not limited to, water management, biodiversity, emissions monitoring, etc., a full Environmental Legal Compliance Audit is conducted every 2 years. An</p>

	<p>includes, inter alia:</p> <ul style="list-style-type: none"> • The National Heritage Resource Act (Act 25 of 1999) • The Occupational Health and Safety Act, 1993 (Act 85 of 1993) • The National Water Act, 1998 (Act 36 of 1998) • The National Environmental Management: Waste Act, 2008 (Act 59 of 2008) • The Limpopo Environmental Management Act, 2003 (Act No. 7 of 2003) • The Atmospheric Pollution Prevention Act, 1965 (Act 45 of 1965) • The Minerals and Petroleum Resources Development Act, 2002 (Act 28 of 2002) 		<p>Environmental Legal Compliance Audit has also been conducted by Tabacks, in conjunction with this assessment.</p> <p>Findings and/or observations made during the audit are logged on DVM's environmental management digital platform, IsoMetrix, and actioned to ensure that the appropriate corrective actions are taken.</p> <p>During our assessment it was illustrated that 95% of findings raised have been closed, while progress on the corrective action of the outstanding findings were evident.</p>
2.	Appeal of Authorisation		
2.1	The holder of the EA must notify all registered, interested and affected party, in writing and within 12 (twelve) calendar days, of receiving notice of the Department's decision to authorise the activity.		<p>Compliant:</p> <p>Notifications that were sent to registered I&APs were available upon request and verified during our 2020 assessment.</p>
2.2	<p>The notification referred must -</p> <p>2.2.1 Specify the date on which the EA was issued;</p> <p>2.2.2 advise all the interested and affected party that a copy of the EA will be furnished or requested;</p> <p>2.2.3 give the reasons for the decision; and</p> <p>2.2.4 inform all the interested and affected parties of the appeal procedure provided for in Chapter 7 of the Regulations.</p>		
3.	Management of the Activity		
3.1	The Environmental Management Programme (EMPr) compiled by the Environmental Resources Management (ERM) and submitted as part of the		<p>Partial Compliance:</p> <p>An EMP Performance Assessment is undertaken annually that includes</p>

	<p>application for an EA is hereby approved by the Department and must be adhered to throughout the lifecycle of the activity.</p>		<p>a comprehensive assessment of the Mine's compliance to the commitments set out in its EMPr as approved by the DMR.</p> <p>The previous EMP Performance assessment was conducted by Tabacks during 2019. From the assessment report, it is clear the DVM is committed to its EMP and has taken the appropriate measures to ensure compliance thereto, albeit some upgrades regarding the stormwater management plan have not yet been finalised.</p>
<p>3.2</p>	<p>The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agents and other people working on the site, and any updates or amendments to the EMPr must be submitted to the Department for approval.</p>		<p>Compliant:</p> <p>During our assessment, it was confirmed and verified that all contractors are subject to work under directions and standards prescribed by DVM.</p> <p>In this regard, Tabacks specifically noted that:</p> <ul style="list-style-type: none"> • A site-specific Aspect and Impact Register is developed with the Contractor, and it is aligned to specific legal obligations and it also relates to the EA conditions and EMPr commitments. • Inspections are carried out on a risk-based approach to ensure that contractors do not deviate from their scope of work. • DVM has an extensive contractor induction program that provides training on environmental-related topics such as, fauna and flora, reporting of incidents, cleaning up of spills, handling of hazardous goods and waste management, to name but a few. • Implementation and knowledge of requirements of the EMPr are managed through DVM's Environmental Management System that is ISO 14001 certificated. • Training material was developed to ensure that all Contractors are fully conversant with DVM's environmental legal compliance requirements. <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Environmental legal training August 2018 presentation and 2020 Objectives and Targets aimed at training on compliance obligations;

			<ul style="list-style-type: none"> • Induction Module_ SDC; • Induction material presented; • Awareness training material: January – July 2020; • Record of monthly inspections conducted at VUP; • Venetia Aspect Register, dated 2019.
3.3	Construction activities must be limited to the current mining lease area as applied for, biodiversity features occurring on the outskirts of the operation footprint must not be encroached upon.		<p>Compliant:</p> <p>As the development of VUP is taking place inside the existing mining area, there is no risk of activities extending outside of the operations footprint. Moreover, the approved design and specific layout plans are in place inspections are conducted on a risk-based approach by DVM to ensure compliance.</p>
3.4	Should a need arise to upgrade the existing wastewater treatment facility an application for an amendment of the approved Waste Management Licence (WML) must be lodged with the Department of Environmental Affairs.		<p>Compliant:</p> <p>The content of this condition is noted.</p> <p>In this regard, Tabacks were advised that a change of plan was communicated to the Department of Human Settlements, Water and Sanitation (“DHSWS”), wherein it was advised that DVM has elected to make use of a package plant, as this will allow the site to reuse the water once treated.</p> <p>There is no licence requirement in respect of the proposed project and as such, it is accepted that the provisions set out in this condition have been complied with.</p>
3.5	The recommendations and mitigation measures recorded in the amended EIAR received by the Department on 15 June 2012 must be adhered to and incorporated as part of the EMPr where applicable.		<p>Partial Compliance:</p> <p>Based on the information provided during the assessment, we are of the view that the current mitigation measures regarding the management of stormwater from the site, at this time, satisfies DVM’s obligation to demonstrate its duty of care in terms of section 19 of the National Water Act, 36 of 1998 (“NWA”). Nevertheless, DVM has subsequently revised</p>

			its initial Stormwater Management Plan which has been presented to DHSWS. Pending approval from DHSWS, interim control measures have been put in place to ensure that no dirty water run-off and seepage enters the receiving environment.
3.6	Deleted as per the amendment of the EA by LEDET dated 6/02/2015.		
3.7	<p>The applicant shall note that in terms of Section 19(1) of the NWA “an owner of the land, a person in control of the land or a person who occupies or uses the land on which”</p> <p>Therefore, any pollution incidents associated with the proposed development must be reported to the Regional Officer of the Department of Water Affairs within 24 hours.</p>		<p>Compliant:</p> <p>DVM has an EMS Emergency Preparedness and Response Procedure that includes reference, to section 20 of the NWA and section 30 of the NEMA relating to the reporting of incidents to the relevant authorities.</p> <p>Proof of reporting of incidents was verified. In this regard it should be noted that all impacts as a result of incidents were contained within the mining right area.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Various letters addressed to the DHSWS reporting “incidents” that occurred at Venetia on 30 January 2020; 11 February 2020; 15 July 2020; and 8 May 2020; • Venetia Mine EMS Emergency Preparedness and Response Procedure, document number VEN-00001566, dated August 2020.
3.8	<p>The mitigation measures as contained in the “surface water input to EIA for planned underground mining and EMP consolidation” report must be implemented. This includes amongst others:</p> <p>3.8.1 In order to ensure sustainable rehabilitation of all the mine residue deposit and stormwater runoff must be contained on top of these facilities. The trenches on the outer slope of the residue deposits and/or along the outer toe-line. This will increase the moisture regime in the profile which will enhance vegetative growth and also contains all sediment wash-off which normally impact the stormwater control system and the environment.</p>		<p>Compliant:</p> <p>The requirement as per conditions 3.8.1 & 3.8.2 have been incorporated as part of DVM's Closure Plan. A preliminary closure plan has been finalised and accepted in principle, and the current construction of the underground operations considers closure requirements.</p> <p>With reference to condition 3.8.3, the stormwater management project was reassessed from an engineering and cost perspective in order to ensure the best possible execution thereof as is also mentioned above. Following the outcome of the assessment, the Stormwater Management Plan was revised and presented to DHSWS. At the time of the</p>

	<p>3.8.2 To limit the runoff volume to the on-site pollution control dam infrastructure must be put in place to control potentially contaminated stormwater runoff at source, such as along the toe of the waste rock deposit, coarse residue deposit and the fine residue deposit.</p> <p>3.8.3 Additional water control structures are required to redirect runoff from catchment 2 and 3 in order to contain most of the runoff in the proposed pollution control dam or the existing pit storm water control dam, etc.</p>		<p>assessment, DVM was still awaiting feedback from the DHSWS in this regard.</p> <p>Notwithstanding the above, we are of the view that this condition is not relevant at this time, as the underground mining operations have not yet commenced. In addition, all the necessary infrastructure to contain dirty water on surface and drain stormwater from the site have already been put in place, during the civil construction phase.</p> <p>Once the VUP is operational it will tie-in with the main stormwater system.</p>
3.9	<p>Accidental spillages of hazardous substances must be reported to the Department of Water Affairs (DWA) within 24 hours and the polluted areas must be remediated or cleaned as stated in section 20 of the NWA.</p>		<p>Compliant:</p> <p>Please refer to our statement under condition 3.7 above.</p> <p>DVM has an Emergency Preparedness and Response Procedure in place that include a reference to reporting of incidents to the relevant authorities. Regular reporting to relevant authorities takes place as and when required. It should, however, be noted that none of the incidents was related to hazardous substance spillage.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Various letters addressed to the DWS reporting “incidents” that occurred at Venetia on 30 January 2020; 11 February 2020; 15 July 2020; and 8 May 2020; • Venetia Mine EMS Emergency Preparedness and Response Procedure, document number VEN-00001566, dated August 2020.
3.10	<p>Section 28 of the NEMA places a duty of care on De Beers Consolidated Mines (Pty) Limited to ensure that reasonable measures are taken to prevent pollution or degradation of the environment from occurring, continuing or reoccurring. Should any environmental damage result from this development or the operation thereof the mine must within 14 days of the damage being caused rectify the situation at his/her own expense.</p>		<p>Compliant:</p> <p>During our assessment DVM illustrated that it has a mature, effective and functional EMS System in place to manage its environmental impacts. In addition, DVM has a detailed EMP that has been incorporated in the Mine’s aspect and impact registers, operational procedures, and standards to ensure adherence to the commitments set</p>

		<p>out in the EMP.</p> <p>Any incident that caused, may cause or potentially cause harm to the environment is reported as per the Mine's EMS requirements and investigated to prevent the reoccurrence thereof. Any reportable incident as prescribed by section 30 of the NEMA and/or section 20 of the NWA is reported to the relevant authorities within the prescribed timeframe. Moreover, a series of internal and external audits are performed to ensure compliance with relevant environmental- and other laws.</p> <p>Following the above, we are of the view that DVM generally complies with the duty of care principle.</p> <p>Notwithstanding the above, it should however be noted that due to the nature of the project, it seems unpractical to expect that any non-compliance with section 28 of the NEMA must be rectified within 14 days, as there may be more degradation to the specific area as part of the development. DVM has an extensive rehabilitation programme in place that is carefully monitored.</p> <p>Nevertheless, it is understood that any instance where there is a spill that occurred and or instances where control measures have been implemented to prevent pollution have failed such instances will receive immediate attention.</p>
3.11	<p>The noise impact study conducted by F le Malherbe and dated October 2011 revealed that there is no noise management in place. In this regard, the following must be done:</p> <p>3.11.1 Regular maintenance schedules, especially for diesel-powered equipment must include the checking of the functional state of intake and exhaust noise attenuators, the effectiveness of enclosures or any other noise control measures;</p> <p>3.11.2 Monthly noise audits must be conducted on all diesel-powered equipment. A change in the noise emission characteristics of equipment must serve as a trigger for a maintenance inspection.</p>	<p>Compliant:</p> <p>All vehicles on site are serviced in accordance with a planned maintenance schedule annually, or more frequently if so required.</p> <p>Monthly noise audits for all diesel equipment on site do not occur. It was explained that noise levels of all vehicles are checked by the Occupational Hygienist during Contractor on-boarding. Repeat audits are conducted annually, vehicles entering the pit are audited quarterly. However, a change in noise emissions will serve as a trigger for a maintenance inspection. Further an amendment to the EA to reflect this has been submitted to the Regulator for approval.</p>

	<p>3.11.3 A noise complaint register must be developed and an effective follow-up procedure is implemented.</p> <p>3.11.4 A yearly survey of ambient noise levels at the boundary of Venetia Mine must be conducted, using procedures specified in SANS 10103.</p> <p>3.11.5 Deleted</p> <p>3.11.6 Record of audits and actions must be kept on-site for monitoring purposes.</p>		<p>DVM has a grievance and incident register in place that is managed by the SHEQ Department for the entire mine. As VUP is located within the mining area noise from the area cannot be monitored in isolation to the rest of the mine's operations. DVM has an effective follow-up procedure in place that prescribes specific actions regarding the investigation of any complaints and feedback to the complainant.</p> <p>Ambient noise surveys are conducted by dBAcoustics annually. The 2019 survey report indicates that both day and night-time noises did not exceed the recommended noise levels as prescribed in SANS 10103:2008.</p> <p>Audit reports and actions are available on site. Results from audits are discussed during Management Review meetings.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Occupational noise survey: July 2019; • Baseline noise survey along the boundaries of the Venetia Mine – 2018 by dBAcoustics; • Presentation EMS Management Review 9 September 2020.
<p>4.</p>	<p>Monitoring</p>		
<p>4.1</p>	<p>The applicant must appoint a suitable experienced Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this EA are implemented and to ensure compliance with the provisions of the approved EMPr.</p>		<p>Compliant:</p> <p>Mr. Anderson is appointed as the ECO for the construction site. Mr. Anderson has dedicated environmental officers such as Mr. Ibart Janse van Rensburg and Mr. Marvel Ngobeni for VUP conduct monthly inspections that report to Mr. Anderson regarding the Contractor's EMS performance and compliance to the EA conditions.</p>
<p>4.2</p>	<p>The ECO shall keep a record of all activities on-site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.</p>		<p>Compliant:</p> <p>Monthly inspections are performed by the Environmental officer and reported to the ECO.</p>

			The ECO oversees any task actioned from such inspections/audits.
4.3	The holder of the EA must notify the Department, in writing within 48 hours, if any conditions of this EA cannot be or is not adhered to.		<p>Noted:</p> <p>There are some of the conditions to the original EA that could not be complied to. A request for amendment was sent to LEDET and some amendments were agreed to. The notification did not take place within 48 hours, however, compliance with this condition will not be possible due to time-lapse.</p> <p>A meeting was held between DVM and DMR on 9 September 2019, regarding advice on the possible amendment of this condition. DMR indicated that this condition refers to future situations where these conditions cannot be adhered to.</p> <p>Conditions to which DVM cannot adhere to were communicated with the DMR and LEDET at various meetings. No new situations were evident which could lead to non-adherence or requiring changes to conditions.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Minutes: DMR1/2019; • Email correspondence trail: 4 – 29 October 2019 to and from DMR and LEDET.
4.4	Records relating to monitoring and auditing must be kept on-site and made available for inspection to any relevant and competent authority in respect of this development.		<p>Compliant:</p> <p>All monitoring and measurement results are available for inspection.</p>
4.5	The Department reserves the right to monitor and audit the development.		<p>Noted</p> <p>The content of this condition is noted.</p>
5.	Recording and Reporting to the Department		

5.1	Amended: De Beers Consolidated Mines Limited must prepare and submit compliance monitoring or environmental audit report as stipulated in an EMP on an annual basis. The report must indicate the applicant's compliance status with regard to the conditions of the EA and must be submitted to the Department.		<p>Compliant:</p> <p>Annual assessments by an independent 3rd party are included in the audit scope.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Proof of submission: 9 December 2019
5.2	The environmental audit/compliance monitoring report must include information included in 5.2.1 - 5.2.3.		<p>Compliant:</p> <p>Refer to the current report submitted.</p>
5.3	Amended: The applicant must ensure that an up to date emergency log is kept during both the construction and operational phase. The emergency log must be made available upon request by the Department.		<p>Compliant:</p> <p>An emergency log is kept on-site and is available upon request thereto.</p>
<p>6. Notification to Authorities</p>			
6.1	Seven days written notice must be given to the Department prior to the commencement of the construction activities. Commencement for the purposes of this condition includes site preparation. A notice must include a date on which it is anticipated that activities will be commenced with and must include the name and contact details of the appointed ECO.		<p>Noted</p> <p>Communication regarding construction activities started in 2013 with the request for amendments to the EA conditions. This is during the time that the ECO was appointed for the project. It is confirmed that the activity commenced within the prescribed timeframe from issuing the EA however notification thereof was not communicated within 7 days as required.</p> <p>A meeting was held between DVM and DMR on 30 September 2019, regarding advice on the possible rectification of retrospective non-compliances. DVM was requested by DMR to deem this requirement as "Noted", as construction is nearly completed.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Minutes: DMR1/2019; • Email correspondence trail: 4 – 29 October 2019 to and from DMR

			and LEDET.
7.	Commencement of the activity		
7.1	This activity must commence within a period of three years from the date when the EA was issued.		Compliant: Confirmation was received that the construction started in October 2013.
7.2	According to the Soil and Land Capability Study undertaken by Terra-Africa Consult cc dated November 2011 and attached as Appendix 3 in Vol 2 of the EIAR, routine fertility analysis must be conducted prior to planting or seeding to create growing conditions that are sustainable for plant growth. Furthermore, gradient of slopes should be planned in such a way that the runoff water will not cause wash ways after rehabilitation.		<p>Compliant:</p> <p>DVM has 3 main waste rock dumps (Krone, Rugen & Venetia). The gradient is currently sloped at 16 degrees.</p> <p>A Vegetation and Rehabilitation Monitoring Survey is conducted annually by Dr. Faan van Wyk. The report remarks that since 2008 experts in the field of rehabilitation became involved in assisting DVM with rehabilitation of their Waste Rock Dumps. The implementation of ecological and engineering principles to these sites has shown huge improvements.</p> <p>DVM used the waste rock to construct a buttress wall around its fine tailings, that will assist with stabilizing the tailings and allow, <i>inter alia</i>, more effective rehabilitation of these dumps.</p> <p>Paddocks were constructed at different levels around the waste rock dumps to control stormwater run-off and prevent erosion. The report by Dr. van Wyk confirms that stormwater control structures are in place and effectively managed.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • The last report provided (compiled by Dr. van Wyk and Mr Gotze) is dated 5 May 2016; • Vegetation and Rehabilitation Monitoring Report compiled by Gudani Consulting and dated July 2019; • Service agreement: Alien vegetation removal dated 1 June 2019; • Landscape function Assessment dated 2017 compiled by Gudani

			Consulting.
7.3	Deleted as per the amendment of the EA by LEDET dated 6/2/2015.		
7.4	Unless the necessary permission is granted by the DAFF in terms of the DFA protected plant species such as <i>Sclerocarya birrea</i> must not be removed.		<p>Compliant:</p> <p>No clearing may commence without first obtaining the necessary permission. In this regard, DVM provided proof that necessary permits are obtained prior to the removal of any protected/champion trees, including the <i>Sclerocarya birrea</i> (Marula) trees.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • LP-VDM-2017-12-05-B (valid 13/12/2017 – 13/12/2019) Inside the mine, Airfield area. • LP-VDM-2017-09-19 B (Valid 6/10/2017 – 6/10/2019) for the Park bay for EMV's and Workshop; • LP-VDM-2018-08-09 B (Valid 6/09/2018 – 6/09/2020) for the integrated operation control centre; • LP-VDM-2018-09-29 B (Valid 31/10/2018 – 31/10/2020) for the topsoil dump; • LP-VDM-2019-05-11 B (Valid 1/07/2019 – 1/07/2020) at the bus terminal • LP-VDM-2018-05-03 B (Valid 4/05/2018 – 4/05/2023) • LP-VDM-2019-08-01 B (Valid 12/08/2019 – 12/08/2020) Plant walkway and conveyor areas; • LP-VDM-2019-04-24 B (Valid 30/04/2019 – 30/04/2020) Underground TTM Mock-up plan; • LP-VDM-2018-01-11 B (Valid 15/02/2018 – 15/02/2020) VUP-laydown area-No man's land; • LP-VDM-2018-01-11 B (Valid 15/02/2018 – 15/02/2020) for the
7.5	Trees that are protected in terms of the Limpopo Environmental Management Act and in terms of the NFA may not be danged without a permit in this regard.		

			<p>VUP powerline to the mine accommodation village;</p> <ul style="list-style-type: none"> • LP-VDM-2018-09-13 B (Valid 27/09/2018 – 27/09/2020) for the laydown area at VUP terrace; and • LP-VDM-2018-09-13 B (Valid 27/09/2018 – 27/09/2020) for the tyre bay stockpile.
7.6	All animals such as birds protected under the Limpopo Environmental Management Act are not allowed to be killed trapped on site unless a permit is obtained from this Department.		<p>Compliant:</p> <p>No poaching, killing, and trapping of any animals is permitted on site. Biodiversity awareness forms part of employee and contractor induction. In addition to the aforementioned actions, awareness training concerning animal management and snake handling is being provided as and when needs are.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia mine EMS animal management procedure, rev 3 DOC NO DBG01128; • Venetia mine EMS Snake spotting and handling procedure, rev 4, DOC NO 0519; • Attendance register: Snake identification and handling 2019-07-30; • Snake Handler List, 2019.
7.7	Construction activities must be suspended and a representative of the SAHRA be contacted immediately in the event of finding or uncovering any subterranean features/resources such as graves, beyond features indicated in the report.		<p>Compliant:</p> <p>No archaeological or burial sites have been identified or discovered on the site. Nevertheless, DVM has a procedure regarding Heritage Resource protection in place. Moreover, resource management forms part of employees' and contractor induction.</p>
7.8	All heritage resources found on-site, i.e. the Iron Age remains, the middle Stone Age site graveyard must not be affected by any activities before a permit which authorises such an impact has been issued by SAHRA.		<p>Maintenance is planned on the bundle conductor and transformer structures located within the Greefswald area of Mapungubwe National Park. Using the results of the previous heritage impact assessment and monitoring report an assessment on the potential impact on heritage (if</p>

			<p>any) based on the project and footprint to be disturbed. Should a permit be required an application would follow engagement with SAHRA.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia mine EMS Heritage resources procedure, rev 4. DOC NO DBG01133; • RF 1 Heritage Monitoring Assessment 2019.
7.9	Dust and nuisance to existing residents must be minimised through the dampening of un-surfaced roads, and construction vehicles must avoid travelling unnecessarily through private land.		<p>Compliant:</p> <p>Dust control measures are in place and the effectiveness of these controls is measured. Non-Compliances/exceedances will be investigated and addressed as per the EMS system standard procedures.</p> <p>Tabacks understand that there are 17 fallout dust monitoring stations situated around the mine to measure the mine's impact on potential sensitive receptors. A further 8 fallout dust monitoring stations are located around the burning grounds area.</p> <p>Results are measured against non-residential limits (1200 mg/m²/day) in line with the National Dust Control Regulations, 2013.</p> <p>Monitoring is conducted monthly and results thereof are submitted to the LEDET on a quarterly and annual basis.</p> <p>Exceedances were investigated during the Annual assessment. Data is submitted quarterly and annually to LEDET.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Email communication 20/03/2019, F Nkhwashu re: Notification of commencement of seepage dam construction; • Air quality self-assessment presentation 2019.
7.10	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate avoidance, reduction,		<p>Compliant:</p> <p>DVM has a waste management procedure in place that endorses the</p>

	<p>recycling, re-use and disposal where appropriate. Uncontaminated builders' rubble generated during the construction can be re-used as backfilling material on site. Ensure that no refuse of builders' rubble generated on the premises is placed, dumped or deposited on adjacent properties or public places and open spaces during or after construction.</p>	<p>hierarchy of waste management. Some backfill has been done with uncontaminated construction material as prescribed.</p> <p>DVM has obtained permission to include pallets and inert waste to be included as backfill together with the building rubble. This is also recorded in DVM's WML – see condition 2.1.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia Mine EMS Green and Blue Area Waste Management Procedure, Doc no VEN-00000927 dated 21/08/2020; • Waste Management Licence issued to Venetia under licence number 12/4/10/8-A/9/V1, dated 25 October 2017.
7.11	<p>Amended: The applicant, contractors and sub-contractors working on the site must ensure that oil, fuel, and chemicals are confined to specific and secure areas throughout the construction period. These materials must be stored in a bunded areas that comply with legislation and standards governing aboveground storage of petroleum products.</p>	<p>Compliant:</p> <p>From site inspections conducted during the environmental legal assessment, no non-compliances were noted in this regard.</p> <p>The applicant has implemented an EMS (ISO 14001:2015 certificated), under which contractors and sub-contractors are compelled to comply with procedures for storage and handling of oil, fuel, and chemicals. Verification of implementation is done by inspections. The frequency of inspections is determined by risk.</p> <p>The SHE coordinators and officers ensure compliance and identify non-conformances.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia Mine Hazardous materials, application and management procedure, Rev 1. DOC NO DBG01132; • Venetia mine EMS Bund wall inspection form. DOC NO DBG01466;

			<ul style="list-style-type: none"> • Venetia Mine EMS Requirements for bund walls procedure, Rev 6. DOC NO VEN 00000207.
7.12	Construction vehicles must be serviced and maintained in a manner whereby excessive smoke and noise production is reduced to acceptable levels, and prevent oil leaks. Contaminated soil must be remediated or removed to an authorised landfill site such as Holfontein.		<p>Compliant:</p> <p>Equipment is inspected before entering the site to ensure they are in good or acceptable repair.</p> <p>All equipment and vehicles are serviced on-site as per their respective maintenance schedules.</p> <p>Procedures are in place for the containment of spills due to mechanical failure outside of the workshop. Awareness campaigns on spill management are in place.</p> <p>North West recycling services is appointed as the waste service provider on site. Any contaminated/ hazardous waste is removed from the site and disposed of at a licensed landfill site. However, DVM has constructed bunkers to initiate a bioremediation programme to treat contaminated soil for reuse in the Mine.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia Mine EMS Spill Management Procedure, Doc no. VEN-00000212, dated 2020/08/28; • Example – Hydrocarbon Spill kit inspections Checklist (VEN-00000339): <ul style="list-style-type: none"> ○ M&H inspection 03/09/2020; ○ Basil read inspection 28/08/2020; ○ VUP SMEI 03/09/2020.
7.13	Residents on the property and surrounding area must be informed if any unusually noisy activities are planned.		<p>Compliant:</p> <p>There is no permanent residence on the site.</p> <p>The last ambient noise survey was conducted by dBAcoustics indicates that both day and night time noises did not exceed the recommended</p>

			<p>noise levels as prescribed in SANS 10103:2008.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> Occupational noise survey: July 2019; Baseline noise survey along the boundaries of the Venetia Mine – 2018 by dBAcoustics.
7.14	Outdoor lighting must point inward towards the facility except for aviation lights. It must be low and yellow intensity globes used.		<p>Compliant:</p> <p>Low-intensity bulbs are used for lighting. The last illumination assessment was conducted in July 2019.</p> <p>Physical barriers are used as shielding to restrict light pollution from the Mine. In addition to the visual impact study performed by SRK, an Illumination Survey Report was recently conducted for DVM. Recommendation from specialist is to conduct illumination monitoring every 5 years.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> Illumination Survey Report PRO 2019-240 Rev 00.
7.15	The removal of vegetation must be restricted to the mining area, especially where mining infrastructure will be located. This vegetation must be used to reduce visual scarring of the landscape and potentially reduce visual impact of the mined area.		<p>Compliant:</p> <p>Clearing of topsoil is done as and when required. In this regard, DVM has a specific Topsoil Management Plan and related procedures, which provides that, for instance, no clearing may commence without obtaining permission to do so.</p> <p>Tabacks further understand that bush clearing is not done prior to soil stripping thereby allowing all existing vegetation to be removed and stockpiled with the soil. This method is specifically chosen to assist with the propagating of plant species ensuring the local mix of natural vegetation when the soil is appropriated for concurrent rehabilitation.</p> <p>A Vegetation and Rehabilitation Monitoring Survey conducted by Dr. Faan van Wyk confirm that since the implementation of ecological and</p>

		<p>engineering principles, the sites have shown huge improvements.</p> <p>A Vegetation survey was conducted during 25 – 29 March 2019 by Mr. Michael Seiderer (M.Sc., Pr.Sci.Nat) of Gudani Consulting.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia Mine Topsoil Management Procedure, Doc no DBG 03968, dated 09/02/2018; • Vegetation and Rehabilitation Assessment Report for Venetia Mine, Vhembe District Municipality, Limpopo Province dated July 2019; • Scope of works for the Eradication and control of alien and invasive plant species as well as vegetation management through chemical treatment at Venetia mine, Rev 01. 2018/05/21; • Botlotsuwa Marketing report 2019.
7.16	Chemical sanitation facilities or systems such as “toilets”: that do not rely on seepage of liquids must be provided with a ratio of one for every 15 workers.	<p>Compliant:</p> <p>The ratio indicated in this condition is not practical on-site due to restricted space and the fact that there are various numbers of contractors on-site at different times. However, facilities are available to Contractors. These facilities are inspected daily and studies are conducted by the occupational hygienist to ensure that the facilities are in an acceptable, safe and hygienic state.</p> <p>A meeting was held between DVM and LEDET/DMR on-site, during July 2016, regarding advice on the possible rectification of retrospective non-compliances. DVM was requested by LEDET/DMR to direct a letter including all the amended requests, which was done. After various follow-ups, it now appears that DVM will have to engage a formal amendment procedure.</p> <p>During the meeting with DMR, it was recorded that sufficient ablution facilities are available on site. No non-compliances were ever raised by</p>

			<p>the Mine Health and Safety Inspectors during regular site inspections.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Minutes of Discussion on Venetia EA & WML; 06/09/2019; • Email correspondence trail: 4 – 29 October 2019 to and from DMR and LEDET.
7.17	Deleted as per the amendment of the EA by LEDET dated 6/2/2015.		
8.	Operation of the Activity		
8.1	Hauling routes for construction vehicles and machinery must be clearly marked and appropriate signalling must be posted to that effect. Further, the movement of construction vehicles and machinery must be restricted to areas outside of the drainage line/wet area.		<p>Compliant:</p> <p>During site observations, it was noted that adequate markings were indicated for hauling routes and traffic signs were posted, where required.</p>
8.2	Appropriate notification signs must be erected at the construction site warning the residents and visitors about the hazards around the construction site and the presence of heavy vehicles and machinery.		<p>Compliant:</p> <p>Construction is taking place inside the mining area. The whole mine area is fenced off and strict access control is in place at the main entrance to the mine. Nevertheless, the required signage is also posted at the entrance to the VUP.</p>
8.3	Appropriate training and protective clothing and/or equipment must be provided and worn and/or used at all-time within all operational areas of the project. Should the clothing and or equipment need to be disposed of, there should be disposed at authorised registered landfill.		<p>Compliant:</p> <p>DVM adheres to the provisions of the MHSA. During site observations, it was noted that all construction and mine employees were wearing the appropriate protective clothing.</p>
8.4	The hydraulic fluids or hazardous chemicals required 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.		<p>Compliant:</p> <p>During the site visit, no non-compliances were noted in this regard.</p>

8.5	Deleted as per the amendment of the EA by LEDET dated 6/2/2015.	
8.6	The stockpiles must not be compacted in any way and must be vegetated with and indigenous grass seed to main fertility.	<p>Compliant:</p> <p>DVM has an approved rehabilitation plan that includes procedures for topsoil management and fertilisation as stipulated by its EMP. These measures may include some compacting to preserve topsoil from run-off and erosion.</p>
8.7	Waste asphalt material produced during the operational phase must be recycled and/or made available to the local communities for the upgrading of private roads.	<p>Compliant:</p> <p>Waste asphalt will be reused if and where possible. Any excess waste cannot be given to communities for use as this provision is in violation of the legal restrictions on Kimberlite removal.</p> <p>No asphalt material was used on-site during 2019/20, as no new tarred areas are evident.</p>
8.8	Ensure that no refuse generated on the premises is placed, dumped or deposited on adjacent properties or public places and open spaces during or after construction.	<p>Compliant:</p> <p>DVM has strict measures in place to ensure that waste is managed and disposed of in a responsible manner. Regular inspections are undertaken for the entire mining area. If any instances of dumping are noted, perpetrators will be dealt with harshly.</p>
8.9	Amended: The current dust fallout monitoring network must be maintained, and a monthly monitoring system must be implemented in order to outputs of the monitoring system to be able to provide accurate data for the enhanced acceptable levels of dust emission.	<p>Compliant:</p> <p>Dust monitoring at VUP forms part of the DVM's monitoring schedule.</p> <p>DVM applies the limits as prescribed by the National Dust Control Regulations (GNR 827/2013), and exceedances will be investigated.</p> <p>Note: The last dust monitoring survey report indicates that dust-fall out is generally low, accordingly, no exceedances from the prescribed limits were noted.</p> <p><u>Document Ref:</u></p>

			<ul style="list-style-type: none"> Air quality self-assessment presentation 2019.
8.10	The hydraulic fluids must be placed such that they prevent spills or leaks to the environment and must be maintained according to operating instructions and the content thereof must be disposed of at any authorised area.		<p>Non-Compliant:</p> <p>Information provided during the assessment suggest that DVM general complies with the provisions of this condition, however, based on observations made at the Decline Workshop, we are of the view that better management regarding the use, handling and storage of hazardous materials is required.</p> <p><u>Specific observations made include:</u></p> <ul style="list-style-type: none"> Hydrocarbon spills from washings were noticeable in the area at the front of the workshop. Bund areas were overflowing. Some lubricant and oils stored at the side of the workshop were not stored inside the bunded area and spills were evident in the area. The area also appeared to be overfull. The water separation system used at the wash bay was overfull and overflows from the area were visible.
8.11	Amended: Regular training as per the Mine Health and Safety Act, 1996 (Act No. 29 of 1996) should be conducted to ensure that all staff is aware of the safety measures as well as the potential environmental hazards associated with their daily activities.		<p>Compliant:</p> <p>DVM has a mature, effective and functioning Safety and Sustainability Department. All Contractors are subject to work under the direction and standards of DVM. An extensive induction program must be completed by all employees and contractors before any work may commence on site. This induction training includes relevant safety measures implemented by the mine as well as various aspects of environmental management, including but not limited to, waste, handling of dangerous goods, cleaning up of spills, animal and heritage awareness training, to name but a few.</p> <p>In addition, an Aspect and Impact Register was developed with Contractors to ensure that activity-specific impacts are identified and aligned with specific legal obligations as well as related ROD conditions and EMPr commitments.</p>

			<p>Daily toolbox talks and pre-task assessments are performed. Where applicable, these information sessions will include specific environmental provisions that must be adhered to.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Induction presentation: Environmental Management Revision 3, Effective Date 05.06.2019.
9.	Site Closure and Decommissioning		
9.1	Should the activity ever cease or become redundant, the applicant shall undertake the required action as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time.		<p>Noted</p> <p>The content of these conditions is noted.</p> <p>The project has not yet entered the decommissioning stage, and therefore, assessment of the provisions are not relevant at this time.</p>
9.2	All future waste rock produced during the underground operations must be utilised during concurrent rehabilitation of the coarse residue deposit and fine residue deposit.		
9.3	Removal and management of the alien vegetation must form part of the concurrent rehabilitation activities and occur on a regular basis throughout the life of the mine.		<p>Compliant:</p> <p>DVM has an active eradication programme in place. An external service provider, Batlotsuwa Marketing, manages the eradication programme on behalf of DVM. Their contract was renewed on the 1st of June 2019 and it will run until the 31st of May 2020.</p> <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Venetia Mine - Vegetation Monitoring - March 2019, REPORT NO: GC/VS/001/19/VM dated 9 July 2019 by Gudani Consulting and Green Thorn Environmental Solutions; • Botlotsuwa Marketing report 2019.
10.	Environmental Commitment by the De Beers Consolidated Mines		

10.1	<p>De Beers Consolidated Mines must contribute to the development of Strategic Environmental tools programmes and projects within the Local Authorities adjacent to the mine. This contribution could be in different forms e.g. financial, technical and provision of information as agreed upon with the Department.</p>	<p>Compliant:</p> <p>As is evident from our previous assessments, DVM invests a lot of effort into its Community Development Programmes, Strategic Environmental Tools as well as Programmes and Projects to assist the Local Council.</p> <p>DVM has an extensive Social Management Plan in place that is monitored carefully by the Social Economic Assessment Committee of which the ECO for VUP is a member.</p> <p>In addition to the De Beers Business Hub that is open to assist the community with business development, access to computers and provide assistant funding for small business enterprises, located in Musina, DVM makes frequent donations to the local government and assist with initiatives such as building schools, Job creation through the Moringa (Ga Kibi) project, etc.</p> <p>Projects planned and included in the 2020 financial planning:</p> <ul style="list-style-type: none"> • Upgrade of Harper Road in Musina • Upgrade several roads Musina Town • Alldays Streetlights (Phase 2) – Blouberg • Alldays Road Paving - Blouberg • Nancefield Sub-Station Upgrade - Musina • Musina Client Service Centre - Vehicle Testing Station • Water supply project in Taaiboschgroet – Bouberg • Musina Water Supply Projects (Additional boreholes and pumps) <p><u>Document Ref:</u></p> <ul style="list-style-type: none"> • Social Labour Plan (2018 - 2022), (submitted 21/12/2018); • Social and Labour plan annual report 2020 (VEN-00000180) • Venetia Mine Future Forum terms of reference in terms of the social
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			<p>and labour plan;</p> <ul style="list-style-type: none"> • Minutes Future forum 10 June 2019; • Blouberg tree planting plan; • Musina tree planting plan (Ga Kibi- project) email 12/09/2019) re: Ga Kibi – Summary of discussions and Next steps; • Socio economic development (SED) plan 2019-2023; • Social performance strategy; • Proof of submission annual performance report, 23 July 2020.
11.	General		
11.1	A copy of this EA must be kept at the property/ on-site office where the activities will be undertaken.		<p>Compliant:</p> <p>A copy of the EA and the letter with amendments thereto were available on-site and presented upon request thereto.</p>
11.2	Where any of the applicant's contact details change, including the name of the responsible person, the physical or postal address and/or telephonic details, the applicant must notify the Department as soon as the new details become known to the applicant.		<p>Compliant:</p> <p>All relevant contact details were updated in the request for an amendment to the EA conditions. No further changes have taken place since.</p>
11.3	National government, provincial government, local authorities or committees appointed in terms of the conditions of this EA or any other public authority shall not be held responsible for any damages or losses suffered by the applicant or his successor in title in any instance where construction or operation be stopped for reasons of non-compliance by the applicant with the conditions of the EA as set out in this document.		<p>Noted</p> <p>The provision of this condition is noted.</p>

End of report