

AUDIT REPORT

ENVIRONMENTAL AND OCCUPATIONAL HEALTH AND SAFETY LEGAL COMPLIANCE

Tronox KZN Sands

Fairbreeze

October 2022

FINAL

Libryo (incorporated in the United Kingdom) external for profit company: 2016/471548/10

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1 INTRODUCTION

Libryo Limited ("Libryo") conducted an Legal compliance Occupational Health and Safety and Environment (the "Audit") for Tronox KZN Sands ("Customer"), of its Fairbreeze (the "Site"), on 17 - 21 October 2022.

2 SCOPE

Libryo performed the scope of work set out in the scope as per, Purchase Order PO 4513179718 dated 14/12/2021. The Site's compliance with the applicable environmental and mine health and safety legal requirements, in terms of national and provincial legislation and local authority by-laws, were assessed via an on-site audit. The audit is conducted using the audit sampling technique, which allows the auditor(s) to check compliance to an extensive number of legal obligations within the limited period of the audit.

3 METHODOLOGY

The audit process entailed, amongst others, the following:

1. **Audit Preparation**, which included pre-audit consultation with the customer to identify any site-specific consideration and to finalise the logistical arrangements, and the gathering of the required documentary evidence by the Site;
2. **Audit Execution**, which included the completion of the audit checklist by the auditors with the input from the various auditees, a site inspection, along with both opening and closing meetings (where possible); and
3. **Audit Conclusion**, which included the drafting and peer review of the audit report.

The Audit was undertaken by Elana Keef and Hanlie Hattingh (the "Auditors") from Libryo. The Auditors relied on information provided by the following persons at the Site (the "Auditees"),

- Khumbulani Buthelezi
- Isaac Ndhrazi
- Pat Jennings
- Sthembile Kunene
- Sibahle Nhlengethwa
- Phiwayinkosi Shandu

as well as information gathered from a review of selected documentation, permits, correspondence, and procedures supplied by the Sites, and various other discussions with relevant departments.

The audit questions were compiled in relation to all environmental and mine health and safety legislation which are applicable to the Site. Where legislation was not applicable to the Site at the time of the audit, the question was removed and is not included in this report.

This report provides for an audit trail, to demonstrate the Site's compliance status.

4 LIMITATIONS

In preparing this Report, the Auditors have relied on the relevant South African legislation effective as at the time of the Audit. Changes to the legislation in the interim may result in the recommendations or conclusions set out in this Report becoming inappropriate or incorrect.

To the extent that this was a remote internal audit with time limitations, there may be instances where the information provided by the Auditees was accepted to be truthful, accurate and complete without verification by thorough perusal of supporting documents.

5 REPORTING OF FINDINGS AND RECOMMENDATIONS

The sections of national and provincial and local authority legislation, which apply to the Site and in terms of which the Site was audited, are set out in Annexure A.

Section 7 of this Audit Report includes an audit trail of the status of compliance against the legislation applicable to the Site's. Any findings of non-compliance include recommendations for corrective action, where applicable.

Observations noted during the Audit which are compliant but have a potential to become non-compliant if action is not taken, are included in the report.

6 SUMMARY OF AUDIT FINDINGS

The breakdown of findings from the audit are found in the table below. All findings are detailed in Section 7 of this report, and recommendations have been included for non-compliant and potential for non-compliances findings. It is recommended that non-compliances and potential for non-compliances are addressed as soon as possible.

Observations are raised for findings that are compliant, but where there are aspects that the Site needs to take note of, or address in order to remain compliant. A total of **29 observations** have been raised.

AUDIT STATISTICS											
ENVIRONMENTAL											
Compliant	70	<p style="text-align: center;">ENVIRONMENTAL AUDIT STATS</p> <table border="1"> <caption>Environmental Audit Stats</caption> <thead> <tr> <th>Category</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Compliant</td> <td>70</td> <td>92.1%</td> </tr> <tr> <td>Non-Compliant</td> <td>6</td> <td>7.9%</td> </tr> </tbody> </table>	Category	Count	Percentage	Compliant	70	92.1%	Non-Compliant	6	7.9%
Category	Count		Percentage								
Compliant	70		92.1%								
Non-Compliant	6	7.9%									
Non-Compliant	6										
TOTAL	76										
OCCUPATIONAL HEALTH & SAFETY											
Compliant	150	<p style="text-align: center;">HEALTH & SAFETY AUDIT STATS</p> <table border="1"> <caption>Health & Safety Audit Stats</caption> <thead> <tr> <th>Category</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Compliant</td> <td>150</td> <td>86.7%</td> </tr> <tr> <td>Non-Compliant</td> <td>23</td> <td>13.3%</td> </tr> </tbody> </table>	Category	Count	Percentage	Compliant	150	86.7%	Non-Compliant	23	13.3%
Category	Count		Percentage								
Compliant	150		86.7%								
Non-Compliant	23	13.3%									
Non-Compliant	23										
TOTAL	173										
OVERALL COMPLIANCE											
Compliant	206	<p style="text-align: center;">OVERALL COMPLIANCE SCORE</p> <table border="1"> <caption>Overall Compliance Score</caption> <thead> <tr> <th>Category</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Compliant</td> <td>206</td> <td>88.4%</td> </tr> <tr> <td>Non-Compliant</td> <td>43</td> <td>11.6%</td> </tr> </tbody> </table>	Category	Count	Percentage	Compliant	206	88.4%	Non-Compliant	43	11.6%
Category	Count		Percentage								
Compliant	206		88.4%								
Non-Compliant	43	11.6%									
Non-Compliant	43										
TOTAL	249										

7 AUDIT FINDINGS AND RECOMMENDATIONS

7.1 ENVIRONMENTAL

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
PLANNING				
1	Have you identified all environmental aspects and impacts?	Tronox KZN Sands Baseline SHERC HIRA Aspect and Impact Register. KZN Risk Register.	C	NEMA (s) 2, 28 MPRDR (r) 60
2	<ul style="list-style-type: none"> Do you have measures in place to prevent pollution, to comply with the applicable legal and other requirements and to continually improve your environmental performance? 	Access to updated legislation via a subscription to the Libryo online legal platform.	C	NEMA (s) 28 NWA (s) 19 MPRDA (s) 37, 38

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
3	Do you have valid environmental authorisations for your operation?	<p>EIA/4187 (Dated: 19/07/2006) - Fairbreeze C Extension</p> <ul style="list-style-type: none"> Amended EIA/4187/1MND/2013 to reflect Biodiversity conservation as opposed to sugarcane cultivation <p>KZN/EIA/0000599/2012 (Ref: DC28/0036/2010 Dated: 12/07/2012) - Construction Fairbreeze and related activities</p> <p>KZN/EIA/0001403/2013 (Ref: DC/28/0033/2013 Dated: 12/12/2014) - EA Wetland Rehabilitation and upgrade of existing bridge.</p> <p>KZN/EIA/0000703/2012 - EA Hillendale Heavy Minerals Plant Relocation.</p> <p>Strategic Offset Management Plan received and authorised in 2016. Consultant appointed to compile the management plan.</p>	C	<p>NEMA (s) 24</p> <p>MPRDA (s) 5A, 102</p>
4	<ul style="list-style-type: none"> Are environmental consultants/auditors registered? 	<p>Kirsten King (EAPASA Registration No: 2019/1695) - compiled basic assessment for Everglades WUL amendment (KZN30/5/1/2/2/123MR: Integrated Environmental Authorisation & Waste Management Licence Dated: 28/03/2022).</p>	C	<p>Section 24H Registration Authority Regs (r) 14</p>
5	<ul style="list-style-type: none"> Have you submitted an EMP / EIA / a statement of environmental consequences to the relevant authorities? 	<p>EMP construction of the Fairbreeze Mine and Related Activities - April 2012 (prepared by Exigent Engineering Consultants) - approval dated 03/08/2012.</p> <ul style="list-style-type: none"> The amended EMP (to include the Everglades RSF) was not available for verification at the time of the audit. 	C	<p>NEMA (s) 24N</p> <p>NEMA EIA Listing Notice 1, Listing Notice 2</p> <p>MPRDA (ch) 4</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
6	<ul style="list-style-type: none"> How do you measure that you comply with the EA/EIA/EMP (and plans/reports)? Has it been submitted to the relevant authority? 	EMP Compliance Audit Report (DEA EIA REF: DC28/0036/2010 DMR Ref: KZN30/5/1/2/2/123MR Dated: April 2021) - <ul style="list-style-type: none"> Proof of submission (Dated: 9/05/2022) 	C	NEMA (s) 240 EIA Regs (r) 34 MA Regs (r) 5.18
7	Does the Site have a prospecting right, mining right, exploration right or production right ?	Mining Rights - <ul style="list-style-type: none"> KZN30/5/1/2/2/123MR (dated 23 March 2010) KZN30/5/1/2/2/164MR (dated 9 April 2009) 	C	MPRDA (s) 5A
8	Does any situation on your site exist which causes, has caused, or may cause significant pollution or degradation of the environment ? What measures do you have in place to rectify it?	The following occasions of potential pollution were observed on the mine and should be addressed: <ol style="list-style-type: none"> Old equipment, which is possibly contaminated with oils, stored outside, directly on the ground (Mine Workshop). Soil pollution can occur from spillages and oils on the equipment washed into the ground during rain. <p>Recommendation: Where equipment/spares need to be stored outside, it needs to be on an impermeable surface where runoff is contained.</p>	NC	NEMA (s) 28 NWA (s) 19
9	Have you received any directive/notice/request for information from an authority, and if so, have you addressed it?	None received since November 2019.	C	NEMA (s) 31N

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
10	Has the site communicated to its employees and managers their rights if refusing to carry out any environmentally hazardous work?	New Employee Induction Slides 2019 - slide 203 deals with the right to refuse.	C	NEMA (s) 2, 29
11	Do you have measures in place to ensure that the employer reports an environmental emergency incident ¹ to the relevant authorities?	<p>Procedure for Emergency Preparedness and Response (Ref: CPDOC-39-294 Approved: 11/01/2021).</p> <p>Fairbreeze Mine (MSRSF) Complex Emergency Preparedness Plan (Ref: MININGDOC-86-107 Rev 5 Dated: 1 Jun 2022).</p> <p>PWP Workshop Emergency Procedures (Ref: MININGDOC-53-74 Rev 5 Dated: Apr 2022).</p> <p>Procedure to follow in case of an environmental incident at Fairbreeze Mine (Ref: MININGDOC-56-71 Rev 2 Dated: Jul 2020).</p>	C	NEMA (s) 30, 30A NEMWA (s) 36 ULM Fire Prevention BL (s) 34 ULM Stormwater Management BI (s) 6
12	<ul style="list-style-type: none"> Do you have measures in place to ensure that the employer takes steps to contain and minimise the effects, clean-up and assess and remedy the effects of an incident? 	<p>Procedure to Address Reportable Incidents (CPDOC-40-69 Approved: 12 April 2021).</p> <p>The Catchment Management Agency (CMA) is currently not included in the list of parties to be notified.</p> <p>Observation: The catchment management agency for the Pongola-Umzimkulu catchment management area is currently not included in the list of emergency contacts.</p>	C	NWA (s) 20

¹ An **environmental emergency incident** in terms of NEMA is an unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
13	<ul style="list-style-type: none"> Has the Site distinguished between an emergency incident and an environmental emergency situation which may be classified as a disaster²? 	<p>The Site has no incident that it classifies as a disaster.</p> <p>There is the likelihood of dam wall failures at the MSRSF, which if unmitigated, could result in a disaster. However, the Valley Return Water Dam will bear the primary impact and act as the main mitigation measure.</p>	C	NEMA (s) 30A DMA (s) 1
14	Are you undertaking any building work on site? If so, do you have approval for such building work?	<p>The Site is currently busy constructing a second shed for the rehabilitation work - Fairbreeze Mine Mine Rehab Rehab shed and laydown area surface bed and slab concrete layout (Drawing No: EX632-CC-01 Rev 1 A1). The drawings were approved by the consulting engineers, with clearance obtained from the Department of Labour in terms of obtaining approval of the drawings (Email from Ben Radebe to Neil Singh RE: building approvals Dated: 18/10/2022).</p>	C	NBRBSA (s) 4

²A **disaster** in terms of the DMA is a progressive or sudden, widespread or localised, natural or human-caused occurrence, which causes or threatens to cause death, injury or disease; damage to property, infrastructure or the environment; or disruption of the life of a community; and is of a magnitude that exceeds the ability of those affected by the disaster to cope with its effects using only their own resources.

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
15	Is the vegetation on your site overgrown or is there other combustible material to create a fire hazard or a nuisance?	Vegetation managed by Silby Construction (Contract No: C9687 Dated: 28/02/2020 Valid: 1 Mar 2020 - 28 Feb 2023). Vegetation is well managed.	C	Standard By-laws Relating to Fire Brigade Services (s) 8 MHSR (r) 8.6 ULM Disaster Management and Fire Prevention BL (s) 14, 16 ULM Fire Prevention BL (s) 14, 21
16	Is housekeeping on site maintained in order to avoid environmental nuisances/hazards ?	Housekeeping around the mine workshops and offices require attention with old equipment, spares, IBC tanks and waste materials stored in non-demarcated areas directly on the ground. Recommendation: Equipment, containers and waste materials need to be stored on an impermeable area that is either bunded in order to contain any leakages/spillages/contaminated runoff.	NC	ULM Health BL (s) 2
17	Has the Site got financial provisions for the rehabilitation, closure and post-closure management of the site?	DMR Proof of submission of documents (Dated: 9/05/2022) regarding the Update of the Quantum of Closure Related Financial Provision for 2021.	C	NEMA (s) 24P MA (r) 5.16

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
WATER RESOURCES				
18	Has the Site mapped out the flow of water on the site? And were as-built drawings submitted to the relevant authority (if required)?	Fairbreeze Mine Index key plan (GME No: 14/18/2/5375 Dated: 31/12/2021).	C	NBR (r) P4, R1 CULM Water Services BL (s) 84
19	Do you conduct a water activity which requires a water use licence (WUL)? If so, do you have a water use licence?	<p>Water use licences -</p> <ul style="list-style-type: none"> • Construction of Fairbreeze infrastructure: Licence No: 21169147 (Ref: 16/2/7/W122/C31 Expires: 23/07/2027) <ul style="list-style-type: none"> ○ Amendment dated: 7/2/2013 • Mining within a 500m radius from a wetland, river or river-crossing, and disposal of water into the MSRSF and RWD - Licence No: 06/W13B/CGI/2229 (Ref: 16/2/7/W122/C31 Expires: 9/09/2033) <ul style="list-style-type: none"> ○ Amendment dated: 18/10/202 to include the Everglades return water dam • Raw water pipeline from Hillendale to Fairbreeze - Licence No: 06/W13B/CI/2603 (Ref: 27/2/2/W213/1/4 Expires: 22/04/2034) • Wetland rehabilitation and offset - Licence No: 11/W13B/IC/7170 (Ref: 27/2/2/W13B/4/3/9 Expired: 22/05/2021) 	C	NWA (s) 22 NEMA (s) 34

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
20	<ul style="list-style-type: none"> Is the Site monitored for compliance to its WUL? 	<p>Water Quality Report includes surface, process as well as groundwater -</p> <ul style="list-style-type: none"> Fairbreeze Mine combined monthly and quarterly water quality update - June 2022 (Ref: MON-WQR-401-FB-19_20 (22-06)). Fairbreeze Mine monthly water quality update - July 2022 (Ref: MON-WQR-401-FB-19_20 (22-07)). <p>Biannual: Aquatic biomonitoring report for the Tronox Fairbreeze Mine: Wet Season Report - 2022 (Ref: BIM-REP-401-19_20 (FB-WET 2022)).</p> <p>The IWWMP, Stormwater Management Plan, WUL audits (both internal and external), as well as the closure report for WUL No: 11/W13B/IC/7170 (wetland rehabilitation and offset) was not available at the time of the audit in order to determine compliance with the various WUL conditions.</p>	NC	WSA (s) 7 NWA (s) 23
21	Does the Site have an agreement/authorisation with regards to its water supply ?	<p>First Amendment to the Agreement between Exxaro Sands (now Tronox) and Mhlathuze Water (Ref: IHM-001 Dated: 21/04/2009).</p> <p>Observation: It is recommended that the Site obtain a copy of the Mhlathuze Water Board's WUL.</p>	C	WSA (s) 6, 7
22	<ul style="list-style-type: none"> Do you have measures in place to ensure that water is not wasted? 	<p>Water consumption is monitored monthly (Kumba Environmental KPIs: Fairbreeze sheet).</p> <p>Water consumed within the process is tracked (Fairbreeze Water Balance 2022).</p>	C	MA Regs (r) 10.19

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
23	Is the quality of drinking water monitored?	Mhlathuze Water Sample Results spreadsheet.	C	MHSR (r) 22.9
24	Do you have an effluent/sewage discharge permit ?	The Site does not discharge effluent to the municipal effluent system. Effluent is sucked and removed from the Site by road and disposed of. <ul style="list-style-type: none"> KRS Logistics & Projects Waste Manifest No: 09130 (Dated: 30/08/2022). 	C	WSA (s) 7 NWA (s) 22
25	<ul style="list-style-type: none"> Does the Site ensure that effluent is not diluted by stormwater? 	Stormwater on site is considered dirty and therefore viewed as effluent.	C	NBR (r) P3 KCDM Water Services BL (s) 84
26	Does the Site ensure that stormwater is not polluted ?	Mine: Stormwater separated by means of berms. PWP: Stormwater separated by means of stormwater channels. The Stormwater Management Plan, as required per the WULs, was not available for verification at the time of the audit. Observation: The Site need to ensure that stormwater is managed in accordance with a Stormwater Management Plan, as required by the WULs.	C	KCDM Water Services BL (s) 84 ULM Stormwater Management BL (s) 2

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
27	<ul style="list-style-type: none"> • Could any of your drainage on Site contaminate a natural water resource (surface or underground)? <ul style="list-style-type: none"> ○ If so, what measures do you have in place to prevent pollution of the water resource? 	<p>Overflow from the Valley Return Dam will drain into a tributary of the Siyayi River, while the overflow from the Pollution Control Dam drains into the Manzamnyama River. Both rivers flow into the sea.</p> <p>The water in neither dam is hazardous, however, it was stated that should the dam overflow, it would be treated as an Environmental Emergency.</p> <p>Surface, ground and process water, as well as the bio-aquatic environment continues to be monitored on a regular basis (refer to findings in terms of the WUL).</p>	C	NWA (s) 19 NWA GN704 (r) 7 KCDM Water Services BL (s) 13, 84
28	Do you separate clean and dirty water?	All water in the process and water and on the mine is dirty water and flows to the water pollution control dam. The water outside of mining and process is clean water.	C	NWA GN 704 (r) 6
29	Are the necessary control measures in place with regards to - <ol style="list-style-type: none"> 1) impoundments or dam containing any poisonous, toxic or injurious substances, and 2) residue stockpiles 	All dams, impoundments and residue facilities are access controlled.	C	NWA GN 704 (r) 8 MA GNR 992 Regs (r) 5.9
30	<ul style="list-style-type: none"> • Is soil and groundwater monitoring conducted? 	<p>Tronox KZN: Fairbreeze Mine Combined Monthly And Quarterly Water Quality Update: June 2022 - Quarter 2 (Ref: MON-WQR-401-FB-19_20 (22-06)).</p> <p>Tronox KZN – Fairbreeze Mine (FB) Monthly Water Quality Update Report: July 2022 (Ref: MON-WQR-401-FB-19_20 (22-07)).</p>	C	Planning and Management of Residue Stockpiles and Residue Deposits Regs (r) 10

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
31	Are drawings of dams available?	Drawings included in the Fairbreeze MSRSF Operations Manual (Vol 2 Dated Oct 2016).	C	MHSR (r) 10.2
32	<ul style="list-style-type: none"> Are safe operating procedures available? 		C	MHSR (r) 10.2
33	<ul style="list-style-type: none"> Are dams inspected and maintained? <ul style="list-style-type: none"> By a competent person? 	Dams are inspected annually - Tronox KZN Sands Dam Inspections: Engineer's Routine Inspection Report 2021 (Doc No: 1001384 Rev 1 Dated: 2021/09/06 Approved by: Frank Denys (Pr Eng)).	C	MHSR (r) 10.2 NWA Regs Regarding the Safety of Dams (r) 32
34	Does the Site have a dam with a safety risk (store more than 50 000 cubic metres of water, which has a wall of a vertical height of more than five metres)? <ul style="list-style-type: none"> Has it been classified? 	Valley Return Water Dam <ul style="list-style-type: none"> Category II Licence No: 12/2/W122/24 (Dated: 3 Nov 2014) Registration letter (Dated: 15 May 2017) 	C	NWA Regulations Regarding the Safety of Dams (r) 2
35	<ul style="list-style-type: none"> Is it licensed? 		C	NWA Regs Regarding the Safety of Dams (r) 5, 10, 17, 24, 38

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
36	<ul style="list-style-type: none"> Is it registered? 		C	NWA Regs Regarding the Safety of Dams (r) 37
37	<ul style="list-style-type: none"> Is there an emergency plan? 	Fairbreeze Mine (MSRSF) Complex Emergency Preparedness Plan (Ref: MININGDOC-86-107 Rev 5 Dated: 1 Jun 2022).	C	NWA Regs Regarding the Safety of Dams (r) 28, 30, 32
38	<ul style="list-style-type: none"> Is an operating and maintenance manual available and implemented? <ul style="list-style-type: none"> Compiled by a competent person? 	Fairbreeze MSRSF Operations Manual (Vol 2 Dated Oct 2016).	C	NWA Regs Regarding the Safety of Dams (r) 32
HAZARDOUS SUBSTANCES (see Section 7.2 HEALTH & SAFETY)				
WASTE MANAGEMENT				
39	As a generator of waste has the Site developed a site specific waste management plan	Procedure for waste management (Ref: CPDOC-40-70 Approved: 12/04/2021).	C	NEM: WA: (s) 16
40	<ul style="list-style-type: none"> Has the Site identified all waste streams, categorised and documented their disposal methods? 	KZN Sands Waste Inventory. Summarised SANS 10234 Re-Classification & Assessment Results (Conducted by: Interwaste Dated: January 2022).	C	Waste Classification and Management Regs (r) 6

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
41	<ul style="list-style-type: none"> Has the Site identified whether waste generated requires classification in terms of a recognised standard? 		C	Waste Classification and Management Regs (r) 4, 11 HCAR (r) 15
42	<ul style="list-style-type: none"> Has the Site identified the classification for "type" of disposal / treatment or landfill site) 		C	Norms & Standards for Disposal (r) 4, 5
43	<ul style="list-style-type: none"> Is health care risk waste included in the Waste management Programme? 		C	Norms and Standards For Premises and Acceptable Monitoring Standards For Environmental Health Practitioners
44	<ul style="list-style-type: none"> Is hazardous biological agents (HBA) waste included in the waste management programme? 		C	HBAR (r) 15
45	<ul style="list-style-type: none"> Does the Site keep record of the waste types and volumes generated by the Site? 	Kumba Environmental KPIs: Fairbreeze sheet.	C	NWIR (r) 8 ((4))
46	Does the Site separate its waste at source?	Waste is stored separately.	C	NEM:WA (s) 16

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
47	Is waste stored to prevent leaking, seepage and spillages, nuisances? Is it labelled?	Waste is stored in waste skips. Where practical, skips are covered. Waste is well labelled throughout the site. No instances of littering or dumping were observed.	C	NEM: WA: (s) 21 HCAR (r) 15 ULM Refuse BL (Chpt 5, Part II)
48	<ul style="list-style-type: none"> Does any littering or dumping taking occur on site? 		C	NEM: WA: (s) 27 NPEPO (s) 2 ULM Refuse BI (Chpt 7) Part I, II
49	Does the site use authorised waste collection service providers?	EnviroServ scheduled trade permit (Ref: 2010/002/17/1/7/1/4/R Valid: 4/03/2020 - 4/03/2020). Observation: The Site needs to ensure that <u>all</u> waste collection service providers used are authorised by the Municipality to render such services.	C	NEM: WA: (s) 16 NEM: WA: (s) 24
50	<ul style="list-style-type: none"> Does the site have a contract in place with the hazardous waste removal service provider? 	Master Services Agreement C11974 with EnviroServ (Dated: 26/07/2021) - clause 1.2. Observation: The Site needs to ensure that contracts with all waste removal service providers requires them to adhere to the relevant Hazardous Chemical Agents Regulations as well as the Hazardous Biological Agents Regulations.	C	HBAR (r) 15 HCAR (r) 15

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
51	Does the site have safe disposal certificates/manifests for the disposal of all waste generated on site?	<p>Non-hazardous waste - EnviroServ Manifest No: 0002024796 (dated and signed off).</p> <p>Hazardous waste - EnviroServ Manifest No: 002023850 (dated and signed off).</p> <p>Septic tank waste - KRS Logistics & Projects Manifest No: 0913 (Dated: 30/08/2022) and Alton site receipt (No: 0452 Dated: 30/08/2022).</p> <p>Sani-waste - Bidvest Steiner Proof of Delivery of SHE Bins (Ticket No: RBY-R0-0262423 Dated: 14/10/2022).</p>	C	NEM: WA: (s) 26
52	Does the site have copies of permits for the waste disposal sites and recycling facilities which they use for the disposal of their waste?	<p>DCLM licence (No: 12/9/11/L770/4 Expired: 3/01/2022).</p> <p>Recommendation: It is recommended that the Site obtain valid licences for <u>all</u> sites where waste is disposed of/recycled/incinerated.</p>	NC	NEM: WA: (s) 26 HBAAR (r) 15
53	Does the site have residue stockpiles or residue deposits? Are these managed in accordance with the EMP or EMPr? Has the site characterised the stockpiles?	<p>MSP Tails - Classification Report (Dated: 01 October 2016 Prepared by: Dolphin Coast Environmental and Laboratory Solutions).</p>	C	NEMWA (s) 43A

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
BIODIVERSITY				
54	Have you done a survey to determine whether you have weeds on your site or alien or invasive species or protected species? If so, what measures have you implemented?	Included in the Final Environmental Programme Report (EMPR) for the Construction of the Fairbreeze Mine and Related Activities (Dated: Apr 2012). Managed in accordance with the - <ul style="list-style-type: none"> • Strategic Offset Management Plan received and authorised in 2016 • Biodiversity offset plan for the Siyaya Plantations Offset Area (Ref: EP320-06 Dated: Sept 2020) 	C	CARA (s) 5 NEM:BA (s) 75
55	Do you have any protected plant species , and if so, do you have a permit?	Licence issued by Agriculture, Forestry and Fisheries - No: KZN0003/04/22-23 (Valid: 2022/04/26 - 2023/04/26) for actions and activities affecting a) Indigenous trees in natural forests and b) Protected trees.	C	NEM:BA (s) 57
56	If the Site cuts, disturbs, destroys, collects, removes, transports, exports, purchases, sells or donates a tree, does it ensure that it has a licence to do so?		C	NFA (s) 7
57	Do you have any animals on your site? If so do you have measures in place to make sure that they are properly cared for?	Procedure for the Control of Wild Animals at Operational Areas (Ref: CPDOC-40-85 Approved: 12/04/2021).	C	AnPA (s) 2

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
58	<ul style="list-style-type: none"> If there are animals on Site (owned or wild), do you have measures in place to take reasonable steps to prevent disease from spreading and eradicating disease, treating animals that have disease, and reporting to the relevant authority? 		C	ADA (s) 11 ADR (r) 12, 12A AHA (s) 17
59	If the Site removes/transfers land cover, does it ensure that it has permission to do so? And does it protect the topsoil?	<p>Standard for Topsoil Management at Fairbreeze Mine (Ref: MININGDOC-71-155 Dated: Jun 2020).</p> <p>Topsoil is stored in stockpiles and as berms until used for rehabilitation.</p>	C	MA Regs (r) 5.12
60	Do you have a boundary fence and is it maintained?	Property is not fenced.	C	FA (s) 24
61	Has the site got measures in place for firefighting? Are firebreaks prepared and maintained where necessary?	<p>Firebreaks are maintained on an ongoing basis by the Rehab & Land Management team, with ad hoc assistance of Silby Construction.</p> <p>The site has 2 x mobile fire hoses and a fire team.</p>	C	CARA (s) 12 NVFFA (s) 12, 17, 18 ULM Disaster Management and Fire Prevention BL (s) 16

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
62	If fire is used for management of vegetation or waste materials, and the preparation of firebreaks, do you have the necessary approvals?	<p>KZN Sands Standard Task Procedure for: Controlled Burning of Veld or Cane (Ref: MININGDOC-57-21).</p> <ul style="list-style-type: none"> Conservation Burning Permit (Issued by: Zululand Fire Protection Association Permit No: 529 Dated 2022-08-11). 	C	<p>ULM Disaster Management and Fire Prevention BL (s) 15</p> <p>ULM Fire Prevention BL (s) 22</p> <p>ULM Nuisances BL (s) 43</p>
63	Does the Site have measures in place to ensure that damaged areas are rehabilitated? Are certificates of compliance obtained from the relevant authority for rehabilitated areas?	Rehabilitation is done in situ. The Site stated that the DMR conducts annual inspections of the site.	C	MA GNR 992 (r) 5.12
64	Is topsoil stored in a specifically selected site?	Topsoil is stored in designated areas, in accordance with the Standard for Topsoil Management at Fairbreeze Mine (Ref: MININGDOC-71-155 Dated: Jun 2020).	C	MA GNR 992 (r) 5.12
AIR/NOISE POLLUTION				
65	Are measures implemented to prevent noise nuisances ?	<p>Sensitive receptors: local residential communities.</p> <p>EMP Compliance Audit Report (Dated: April 2021).</p> <p>Noise surveys were not available for verification at the time of the audit.</p> <p>Recommendations: It is recommended that the Site conduct perimeter noise surveys to determine whether noise emanating from the site is within allowable limits.</p>	NC	ECA Noise Control Regs (s) 4, 5

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
66	Do you have measures in place to ensure compliance with standards for ambient air quality / emissions?	Air quality management plan - Dust Management Strategy for the Hillendale and Fairbreeze Mines (Dated: Jan 2018 Rev 6). Monitoring - <ul style="list-style-type: none"> PM-10 monitored via the Tronox KZN Sands Operations Management System Monthly dust monitoring (Fairbreeze Ambient Perimeter Monitoring Dust Fallout) 	C	Ambient Air Quality Standards (s) 2.3
67	Does the site generate dust ? If yes, is there a Dustfall Monitoring Program in place? And are the results submitted to the relevant authority?	Air quality management plan (Dated: Jan 2018 Rev 6). <ul style="list-style-type: none"> Monthly dust monitoring (Fairbreeze Ambient Perimeter Monitoring Dust Fallout) 	C	NEM:AQA Dust Regs (r) 4 MPRDR (s) 128 MA Regs (r) 10.24
68	Does the site have any diesel driven vehicles and if so are they tested regularly with a Hartridge metre for their emissions?	Fleet vehicles are maintained according to manufacturer's specifications.	C	APPA Regs (GN R1651)
HERITAGE				
69	Does the Site have any graves on Site?	Fairbreeze Grave Relocation Heritage Management Plan for Grave Relocation (Dated: 2/08/2015). Monthly heritage surveys conducted by Umland - <ul style="list-style-type: none"> Report: Aug 2022 Report: Sept 2022 	C	NHRA (s) 36
ENERGY EFFICIENCY				

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
70	Has the site implemented energy efficiency measures?	Kumba Environmental KPIs: Fairbreeze sheet.	C	NBRSA Regs (r) XA
NUCLEAR				
71	Does the site have a nuclear installation licence , nuclear vessel licence or certificate of registration?	<p>NNR Certificate of Registration No. COR-43, Variation 1 for Exxaro, 10 October 2007 for Hillrindale and CPC. Fairbreeze Mine is not mentioned.</p> <p>Letter requesting change of company name to NNR, Document reference nr. COR-43A0304, 24 July 2019.</p> <p>Recommendation: Ensure Fairbreeze is included in the NNR COR.</p>	C	NNRA (s) 20 NNRR (r) 2.3, 2.4
72	<ul style="list-style-type: none"> Is the licence or certificate of registration displayed? 	<p>A decision was taken in 2020 to remove the CoR-43 from its display areas until the correct CoR was received from the NNR, based on a recommendation by African Radiation Consultants, Audit report, 18 November 2020.</p> <p>Recommendation: Ensure the licence is displayed as required.</p>	NC	NNRA (s) 26

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
73	<ul style="list-style-type: none"> Has the Site implemented a monitoring programme to determine compliance with the authorisation? 	<p>Radiation protection programme for operations and maintenance workers, CPDOC-55-68, July 2021.</p> <p>Radiation protection programme for the public, CPDOC-55-74, August 2022.</p> <p>African Radiation Consultants, Audit report, 18 November 2020.</p>	C	NNRA (s) 26 NNRR (r) 4.3, 4.7
74	<ul style="list-style-type: none"> Has the site conducted a hazard assessment which has been approved by the NNR? 	<p>Worker Safety Assessment For Tronox KZN Sands, SHERCDOC-68-2738, v.1, 07 / 02 / 2021, Section 7.2, indicates that MSP being a Radiation Supervised area, workers from the MSP are regarded as Occupationally Exposed Persons (OEPs). PWP is not mentioned.</p> <p>Acknowledgement of receipt and approval, NNR, LB/35/6/11/43, Our Reference: COR43B0309, Your Reference: COR43A0355, 18/03/22.</p>	C	NNRR (r) 4.1
75	<ul style="list-style-type: none"> Does the Site submit an annual report to the NNR? 	<p>Acknowledgement of receipt by NRR for receipt of the Worker Dose Report for 2021 Calendar Year, 17 May 2022.</p> <p>Acknowledgement of receipt by NRR for receipt of the Waste And Effluent Report for 2021 Calendar Year, 17 May 2022.</p>	C	NNRR (r) 4.10
76	<ul style="list-style-type: none"> Does the Site have an emergency plan for radioactive material? 	<p>Radiation Emergency preparedness procedure for operations at Tronox, CPDOC-55-66, 22 July 2022.</p>	C	NNRA (s) 38

7.2 OCCUPATIONAL HEALTH & SAFETY

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
HEALTH AND SAFETY PLANNING				
1	<p>Has the company compiled a Health and Safety Policy?</p> <ul style="list-style-type: none"> Is it displayed? 	<p>Tronox KZN Sands Safety, Health, Environment, Radiation and Quality (SHERQ) Policy Statement, v. 7, CPDOC-39-290, September 2020.</p> <p>Tronox KZN Sands Fairbreeze Mine Health and Safety, Policy, v. 3, CPDOC-39-296, August 2020.</p> <p>Observed the displayed policies on various notice boards.</p>	C	MHSA (s) 2, 8, 22
2	Are employees' rights communicated?	<p>Five days and general safety induction.</p> <p>KZN Sands SHE Committee Structure, v.7, CPDOC-39-309, 12 APRIL 2021.</p>	C	BCEA (s) 30 BCEA Regs in terms of 86(1) (s) 2 MHSA (s) 23
3	<ul style="list-style-type: none"> Medicals (night work) 	<p>Medicals related to night work is not specifically addressed in the Tronox KZN Sands Hillendale and Fairbreeze Mines and Central Processing Complex Mandatory Code Of Practice For Minimum Standards of Fitness to Perform Work at a Mine, v. 5, CPDOC-51-72, 08/04/2022.</p> <p>Recommendation: Ensure that night work / shift is specifically addressed in the procedure.</p>	NC	BCEA (s) 17

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
4	<ul style="list-style-type: none"> • SARS-COV-2 	<p>Attendance register for training on the Mandatory COP for the mitigation and management of Covid-19 outbreak, v.1, CPDOC-51-16, on the following dates:</p> <ul style="list-style-type: none"> • 25/05/2020 • 22/05/2020 • 21/05/2020 	C	<p>Code of Practice: Managing exposure to SARS-CoV-2 in the Workplace (s) 15</p> <p>Guideline: Mandatory Code of Practice on the Mitigation and Management of Covid-19 Part C (s) 3</p>
5	<p>Does the company have a functioning HSE management system? How do you ensure the health and safety of your employees at work?</p>	<p>KZN Risk Register, Business Risk Register. 2020.</p> <p>Tronox KZN Sands Baseline SHERC HIRA Aspect and Impact Register, SHERCD0C-66-822, v. 8, 2022.</p> <p>Procedures for:</p> <ul style="list-style-type: none"> • KZN Sands Mandatory COP Management of Medical Incapacity due to ill health injury, CPDOC-51-131, February 2022. • KZN Mandatory COP for Minimum Standards of Fitness to Perform Work at a Mine, CPDOC-51-72, February 2022. • Code of Practice for the Operation of Trackless Mobile Machinery, MININGDOC-53-7, 24 August 2017 	C	<p>MHSA (s) 5</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
6	Does the Site implement codes of practice affecting the health and safety of employees and other people that may be affected by activities on the mine? Are the COPs approved and valid?	SOP for Fitness Criteria to Perform Work at Tronox KZN Sands, CPDOC-51-84, Version nr, 3, Implementation date: October 2006, Print date, 21 August 2022 09:54, Signed by Regional SHEQ Manager, Sipho Mkhwanazi, 08 / 24 / 2022.	C	MHSA (s) 9
7	Have risk assessments been compiled and communicated?	KZN Risk Register, Business Risk Register. Tronox KZN Sands Baseline SHERC HIRA Aspect and Impact Register (SHERCDOC-66-822, v. 8, 2022). KZN Sands Acknowledgement Form Mining Production High Risk Summary and controls (MININGDOC-71-54, v.5, Fairbreeze Mine, Mining Production, 09/06/2022).	C	MHSA (s) 5, 22 HBAR (r) 6
8	<ul style="list-style-type: none"> Are there training programmes in place to ensure employees are familiar with the risks associated with their jobs? 	Training matrix indicating training completed, including induction, STP / TIP training with completion dates. KZN Sands Acknowledgement form: Mining Production High Risk Summary and Controls, Fairbreeze Mine (09/06/2022). Induction, General Safety induction for visitors and 5 day induction for all employees and contractors.	C	MHSA (s) 10
9	Do you maintain permissible working hours ? <ul style="list-style-type: none"> If not, have you obtained an exemption? 	HR Policy Working Hours, Pay for Work on Sundays, Public holidays, and Overtime (CPDOC 43-240, 24 October 2016).	C	BCEA (s) 9, 10

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
10	Does the Site have written agreements in terms of night work ?	<p>A written agreement or contract of employment pertaining to night work was not available for auditing purposes.</p> <p>Recommendation: Ensure that night shift is clearly specified in the offer of employment, or in a written format, to ascertain agreement.</p>	NC	BCEA (s) 17
11	<ul style="list-style-type: none"> Are the necessary agreements/arrangements with the employees in place? 	<p>Work hours are indicated under paragraph 5 of the offer of employment letters. The letters refer to the 12 hour shift, but not night shift specifically.</p> <p>Recommendation: Ensure that night shift is clearly specified in the offer of employment, or in a written format, to ascertain agreement.</p>	NC	
12	<ul style="list-style-type: none"> Have the risks been assessed? 	<p>Risks relating to night shift have not been assessed.</p> <p>Recommendation: Ensure risks associated with night shift are assessed.</p>	NC	
13	Is there a policy or procedure in place to protect pregnant and breastfeeding mothers in the workplace?	<p>SOP for the Protection of Employees During Pregnancy and After the Birth of a Child (v.3, CPDOC-51-109, Print date: 24 October 2022).</p>	C	BCEA (s) 26 Code of practice on the protection of employees during pregnancy and after childbirth

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
14	<ul style="list-style-type: none"> Have the risks been assessed? 	<p>Risks associated with pregnant and breastfeeding mothers have not been assessed in the Business nor the Baseline Risk Assessments.</p> <p>Recommendation: Ensure risks associated with pregnant and breastfeeding mothers are assessed.</p>	NC	
15	<p>Does the Site employ young people?</p> <ul style="list-style-type: none"> Have the risks been assessed? 	<p>Young people under 18 may not be employed at Tronox.</p> <p>SOP for Fitness Criteria to Perform Work at Tronox KZN Sands (CPDOC-51-84, v 3, Implementation date: October 2006, Print date, 21 August 2022 09:54, Signed by Regional SHEQ Manager, Siphon Mkhwanazi, 08 / 24 / 2022 (Section 5.1.4.)).</p>	C	<p>BCEA (s) 46</p> <p>Regs on Safety of children in the workplace (s) 3</p>
16	Does the Site have an HIV/AIDS Policy in place?	Tronox South Africa COVID-19 Policy (SHEQ-REG-POL-01, CPDOC-39-450, v. 03, June 2022).	C	Code of Good Practice: HIV/AIDS
17	Has a SARS-CoV-2 risk assessment been conducted?	KZN_Sands_COVID-19_Risk_Assessment (SHERCDOC-66-6096, v. 08, 2022/05/11).	C	<p>Code of Practice: Managing exposure to SARS-CoV-2 in the Workplace (s) 5</p> <p>Guideline: Mandatory Code of Practice on the Mitigation and Management of Covid-19 Part C (s) 8.1</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
18	<ul style="list-style-type: none"> Has the Site prepared a Workplace Plan in terms of SARS-CoV-2? 	Mandatory COP for the Mitigation and Management of COVID-19 Outbreak, v. 1, 25 May 2020.	C	Code of Practice: Managing exposure to SARS-CoV-2 in the Workplace (s) 5 Guideline: Mandatory Code of Practice on the Mitigation and Management of Covid-19 Part C (s) 8.3
19	<ul style="list-style-type: none"> Has there been consultation with the trade union and health and safety committee? 	<p>Bongani Mpontshane, NUM Chairperson and Brian Jansen, SHE Representative were on the drafting committee of the Mandatory COP for the Mitigation and Management of COVID-19 Outbreak, v. 1, 25 May 2020.</p> <p>Observation: Ensure consultation with the health and safety committee when developing the code of practice / Mandatory COP.</p>	C	Code of Practice: Managing exposure to SARS-CoV-2 in the Workplace (s) 5 Guideline: Mandatory Code of Practice on the Mitigation and Management of Covid-19 Part D (s) 3

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
20	<ul style="list-style-type: none"> Have workers been notified of the Code and the contents of the workplace plan? 	<p>Observed COVID 19 notices on the notice boards.</p> <p>Communication takes place through the SHE Committee, company procedures and supervisors are responsible to share. Communications Department, e-mail message from TRONOXConnect KZN, 25/07/2022, operational update on the SARS-CoV-2 Code of Practice and content of the Workplan to all KZN and Fairebreeze.</p>	C	<p>Code of Practice: Managing exposure to SARS-CoV-2 in the Workplace (s) 7</p> <p>Guideline: Mandatory Code of Practice on the Mitigation and Management of Covid-19 Part D (s) 3</p>
21	<p>Are there procedures in place to address the reporting and investigating of incidents and infectious diseases taking into account the regulatory requirements? And are records kept?</p>	<p>Procedure for Management of Incidents, CPDOC-37-96, 29 October 2021.</p> <p>Incident recorded on the Pivot system, the incident investigation with the actions and close out of the incidents are captured.</p> <p>Pivot management system, 4 Feb 2022, INC 17001-014752-112, Anton Ferreira incident, LTI, Investigated and actions assigned, Viewed ICAM incident report, with - 27 pages. Records kept. Annexure 1 report observed. –</p> <p>No infectious diseases were reported during the last 2 years.</p> <p>Statistics are downloaded from the Pivot incident management system into a SHEC Stats spreadsheet, with a report submitted to the Board.</p>	C	<p>COIDA (s) 38. 39</p> <p>GAR (r) 9</p> <p>Regulation on IOD/OD documents (s) 1</p> <p>MHSA (s) 11</p> <p>MHSA Regs GNR 93 (Chapter), 23</p> <p>MA GNR 992 (r) 2.19</p> <p>ULM Fire Prevention BL (s) 34</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
22	<ul style="list-style-type: none"> Are incidents/infectious diseases investigated and reported in the correct formats? 	<p>Procedure for Management of Incidents, CPDOC-37-96, 29 October 2021, specifies the reporting format and the methodology used.</p> <p>Incident recorded on the Pivot system, the incident investigation with the actions and close out of the incidents are captured.</p> <p>Completed SAMRASS 1 as prescribed for Anton Ferreira, Lost time injury, 2022/0/204.</p> <p>Proof of submission to the DMR.</p>	C	<p>GAR (r) 8, 9</p> <p>COIDA: Notice on Compensation for Occupationally-Acquired COVID-19 (s) 6</p> <p>Regulation on IOD/OD documents (s) 1</p>
23	<ul style="list-style-type: none"> Does the Site have a procedure in place to ensure that in the case of a death occurring on the Mine, that the place where the accident occurred must not be disturbed, without the consent of the Principal Inspector of Mines 	<p>Procedure for Emergency Preparedness at Tronox KZN Sands, CPDOC-39-294, v. 30, 11 Jan 2021. Page 12 of 19.</p>	C	<p>MHSA GN R93 (s) 10.1</p>
24	<ul style="list-style-type: none"> Are corrective actions arising from incident/accident investigations implemented? 	<p>Incident recorded on the Pivot system, the incident investigation with the actions and close out of the incidents are captured. Only closed out when all actions have been implemented.</p>	C	<p>GAR (r) 9</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
25	Does the Site have measures in place to ensure that an injured employee is conveyed to a medical facility to receive attention?	<p>I.C.E Ambulance services / Medical Rescue, with trained and registered paramedics (Contract nr. C05641-Mod.5 extension signed on 4 July 2022).</p> <ul style="list-style-type: none"> • Furniss Wayne Drew, HPCSA Reg nr; ANT0014915, 1 Apr 2022 – 31 Mar 2023 • Revival N Ncanana, Basic Health Care Assistant Certificate nr N-115-13BHA, 10/05/2013 – no expiry date. Academy of Health Care Management Training, SAQA, AHMT, HSETA, Accreditation nr. C1500. • Nombuyiselo Fkazi, HPCSA Registration nr. BAA1645633, Obtained 17 Nov 2017 Active status: 14 Dec 2017 – 31 Mar 2023. • Sakele Petros Nyawo, HPCSA Registration nr. BAA0606987, Valid 1 April 2022 – 31 Mar 2023 <p>Observation: Ensure all training certificates are valid.</p>	C	COIDA (s) 72
26	Are employees covered in terms of workmen's compensation ? Is the Company registered with the relevant authority (if required)?	Tronox KZN Sands PTY LTD, Letter of Good Standing (Expiry date : 31 Jan 2023, Number Of Employees: 802)	C	COIDA (s) 80 ODMWA (s) 62

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
FIRE AND EMERGENCY				
27	Is there suitable fire detection and fire fighting equipment available on site?	Observed fire detection and extinguishers available on site in all areas are inspected and serviced.	C	NBRBSA Regs (r) T2 ERW (r) 9
28	<ul style="list-style-type: none"> • Is fire equipment inspected and maintained as required? <ul style="list-style-type: none"> ○ By a registered person? 	<p>Fairbreeze Statutory Maintenance Plan, 2020 lists all the fire equipment and SAP asset register.</p> <p>Services done by Zululand Fire Control Cc. Registration certificate was not available for auditing purposes.</p> <p>Observation: Ensure proof of registration is available for the inspection and maintenance of fire equipment.</p>	C	FBA (s) 18 PER (r) 19 ERW (r) 9 ULM Disaster Management and Fire Prevention BL (s) 20 ULM Fire Prevention BL (s) 7
29	Are emergency procedures available?	Procedure for Emergency Preparedness at Tronox KZN Sands (CPDOC-39-294, v. 30, 11 Jan 2021. Page 12 of 19).	C	GSR (r) 3
30	<ul style="list-style-type: none"> • Are emergency evacuation procedures and emergency telephone numbers displayed? 	Observed emergency numbers displayed on notice boards.	C	NBRBSA Regs (r) T1
31	<ul style="list-style-type: none"> • Is emergency equipment and escape routes signposted? 	Observed emergency equipment and escape routes signposted.	C	Standard By-laws Relating to Fire Brigade Services (s) 10 ULM Fire Prevention BL (s) 5, 6

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
32	<ul style="list-style-type: none"> Is emergency equipment and escape routes accessible? 	Observed emergency equipment and escape routes are unobstructed and accessible.	C	ERW (r) 9 ULM Disaster Management and Fire Prevention BL (s) 18, 21
33	<ul style="list-style-type: none"> Are emergency drills conducted to test the procedures and provide training? 	Emergency evacuation drill report, Fairbreeze, PWP Production, 10 July 2022, 19:07, Team A.	C	ULM Fire Prevention BL (s) 5, 6
34	Are there first aid facilities available?	First aid boxes labelled with inspection stickers as well as the location and names of the first aiders, and indicated by signage. <ul style="list-style-type: none"> Inspection record for First aid box, Serial nr. 1546432, Control Room, 17/10/2022 by KW Mashwayi. 	C	GSR (r) 3 MHSA GN R992 (Chapter) 24
35	<ul style="list-style-type: none"> Are first aid boxes stocked and regularly inspected? 		C	
36	<ul style="list-style-type: none"> Is signage displayed to indicate the location of the first aid box and the identity of the first aider on duty? 		C	
37	Are there sufficient emergency personnel and first aiders appointed and trained? Must be a first aider for every shift.	At least one per shift, paramedics on duty during both day and night shifts. <ul style="list-style-type: none"> TRONOX ERT ORGANOGRAM, 2020 	C	GSR (r) 3

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
HAZARDOUS SUBSTANCES				
38	Are there any Group IV ³ equipment on site which contains radioactive sources? If so, are they registered?	Tronox KZN Sands LTD, SAHPRA, File No.: 1513/1 Authority NO.22/0967, Fairbreeze Mine, signed on 01 August 2022 expires on 31 October 2022. <ul style="list-style-type: none"> • Radiation Protection Officer: MR B CWELE • Acting Radiation Protection Officer: MR Z GUMEDE 	C	HSA (s) 3A
39	<ul style="list-style-type: none"> • Is there a Radiation Protection Officer (RPO) and Acting Radiation Protection Officer (ARPO) appointed? 	Appointment letters for - <ul style="list-style-type: none"> • Radiation Protection Officer: MR B CWELE (Dated: 5 Nov 2021) • Acting Radiation Protection Officer: MR Z GUMEDE (Dated: 5 Nov 2021). 	C	Group IV Hazardous Substances Regs (r) 6
40	<ul style="list-style-type: none"> • Are internal rules available and implemented? 	Procedure for Radioactive sources (CPDOC-55-78, v3, 10 November 2021). The procedure is implemented.	C	Group IV Hazardous Substances Regs (r) 7
41	<ul style="list-style-type: none"> • Are stock records kept? 	Photographic evidence of the Stock records viewed. Stocks are kept at CPC.	C	Group IV Hazardous Substances Regs (r) 9

³ [Group IV](#): Radioactive sources (outside of a nuclear installation)

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
42	<ul style="list-style-type: none"> Is there a register of radiation workers? 	<p>Worker Safety Assessment For Tronox KZN Sands (SHERCD0C-68-2738, v.1, 07 / 02 / 2021, Section 7.2) indicates MSP as a Radiation Supervised area. Workers from the MSP are regarded as Occupationally Exposed Persons (OEPs). PWP is not mentioned (CPC TRONOX MS list -Final revision, undated).</p> <p>OEP Dose Register for 2022.</p>	C	Group IV Hazardous Substances Regs (r) 14
43	<ul style="list-style-type: none"> Are controlled areas demarcated, signage and access controlled? 	<p>Observed the demarcation, signage and access control to controlled areas.</p>	C	Group IV Hazardous Substances Regs (r) 8, 32, 33

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
44	Are flammable substances stored/used on site and are the storage/usage facilities registered with the fire department?	<p>Umlalazi Municipality By-laws relating to Flammable Liquids and Substances, Certificate of Registration nr 12/2022, Fairbreeze Mine, 27 June 2022, expiry 30/06/2023 for the storage and handling of the following:</p> <ul style="list-style-type: none"> • Class 1 = 23000 litres <p>The following registration certificates were not available for auditing purposes:</p> <ul style="list-style-type: none"> • Flammable gas storage at PWP (>19 kg) • Oil store at PWP (>200 litres). <p>Recommendation: Ensure certificates of registration are available for all storage and handling of inflammable substances in excess of the stated volumes.</p>	C	GSR (r) 4 ULM Fire Prevention BL (s) 23
45	<ul style="list-style-type: none"> • Is the registration certificate displayed in a conspicuous place? 	Observed the displayed certificate of registration.	C	
46	<ul style="list-style-type: none"> • Is the required signage displayed at the flammable store (including signs prohibiting smoking and open flames)? 	<p>Observed the following signage:</p> <ul style="list-style-type: none"> • No smoking • No open flames <p>Observation: Ensure signage displayed is in accordance with the standards (size and type) and displayed to be easily seen, e.g. at the entrance of the storage facilities.</p>	C	ULM Fire Prevention BL (s) 35

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
47	Does the Site keep a register of all hazardous chemicals used or stored on site? And is it accessible to all employees?	Filing Index for Material Data Sheet (MSDS), Fairbreeze PWP Maintenance. Register is kept on a file next to the chemical storage.	C	OHSA (s) 10 FFARSRA (s) 7
48	<ul style="list-style-type: none"> Are there Material Safety Data Sheets (MSDS) available for all chemicals used or stored on the site, and are they readily available? 	<p>(M)SDS observed:</p> <ul style="list-style-type: none"> GR 1300, undated Sodium Hypochlorite, undated. <p>File with Filing Index for Material Safety Data Sheets (MSDS), Fairbreeze PWP Maintenance with at least the following MSDSs:</p> <ul style="list-style-type: none"> Acetylene Bio clean Concentrate Diesel 500 Version 1, Sasol Engen Premium Motor oil 10W Gengear 320 <p>Observation: Ensure material data sheets are compliant with the requirements of Regulation 14A of the Hazardous Chemical Agents Regulations.</p>	C	OHSA (s) 10 Annexure 8 HCAR 14A

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
49	<ul style="list-style-type: none"> Has the Site implemented measures to ensure that hazardous substances are stored and handled in a safe manner to its employees and the environment? 	<p>HCS Management Programme Framework (CPDOC-39-305, 26/05/2008).</p> <p>Observed the following measures in storage areas:</p> <ul style="list-style-type: none"> Bunding Ventilated Access Controlled Signage 	C	<p>HCAR (r) 3</p> <p>ULM Fire Prevention BL (s) 36</p>
50	<ul style="list-style-type: none"> Are chemicals on Site identified according to recognised standards for the purpose of compatibility in storage and handling purposes. 	<p>Evidence is not available for the classification of chemicals according to recognised standards for the purpose of compatibility in storage and handling purposes for auditing purposes.</p> <p>Recommendation: Ensure classification of chemicals according to recognised standards for the purpose of compatibility in storage and handling purposes.</p>	NC	<p>GSR (r) 4</p>
51	<ul style="list-style-type: none"> Are chemicals on Site stored in demarcated areas, labelled, closed and contained in a bunded area to prevent spillage? 	<p>Observed the storage of chemicals in demarcated areas, labelled, closed and contained in a bunded area to prevent spillage.</p>	C	<p>GSR (r) 4</p> <p>HCAR (r) 14B, 14C</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
52	<ul style="list-style-type: none"> Are eye wash facilities and safety showers available in areas where chemical contamination can occur? Were the employees trained on the uses thereof? 	<p>Photographic evidence of the eye wash and safety showers at the storage facilities.</p> <p>Observation: Ensure training is provided on the use of eye wash and safety shower facilities.</p>	C	GSR (r) 3
53	Are their bulk chemical tanks on site and are they maintained to ensure that no leaks occur?	Diesel storage tanks on site. The Tanks are bunded and well maintained.	C	GSR (r) 4

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
54	Have biological agents on Site been classified according to hazard and categories of contaminant?	Hazardous Biological Agents Survey At The Fairbreeze Mine (1 APRIL 2022, Report No: 22048MP01.Q1 NOSA Occupational Hygiene Services) -	C	HBAR (r) 3
55	<ul style="list-style-type: none"> Has the Site implemented procedures regarding the control measures, machinery and facilities in terms of biological agents? Are these developed and maintained by a competent person? 	<ul style="list-style-type: none"> Recommendations made by Steven M Pretorius (Occupational Hygiene Technologist, SAIOH Member nr. 54999883, Certificate ID: 54999883-23314). <p>A Continuous Health Risk Assessment at The Fairbreeze Mine (NOSA Occupational Hygiene Services, 02 TO 04 NOVEMBER 2021, REPORT NO: 21116LB10.Q4) -</p> <ul style="list-style-type: none"> Jacques Jooste, Occupational Hygienist (SAIOH Member nr. 0629, Member ID: 33914727, Certificate ID: 33914727-20999, Valid until 31 January 2022). <p>Observation: Ensure implemented procedures regarding the control measures, machinery and facilities in terms of biological agents are available.</p>	C	HBAR (r) 10, 12
56	<ul style="list-style-type: none"> Have employees been trained in terms of the risks associated with, and the use and handling of HBAs? 	<p>Training records were not available for auditing purposes.</p> <p>Recommendation: Ensure training is provided and records are available for risks associated with, and the use and handling of HBAs.</p>	NC	HBAR (r) 4

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
57	<ul style="list-style-type: none"> Are HBAs on Site stored in labelled, closed, colour coded containers in order to prevent the spread of contamination? 	Stored HBAs were not observed on site. There were disposal boxes available for masks, which were labelled and colour coded.	C	HBAR (r) 14
58	<p>Does the site transport or receive dangerous goods?</p> <ul style="list-style-type: none"> If yes then does the site have a procedure in place for the management of dangerous goods? 	Hazardous Chemical Substance (Hcs) Management Program, CPDOC-39-305, v. 6, 26/05/2008.	C	NRTR (r) 275, 277 HCAR (r) 14C
59	<ul style="list-style-type: none"> Are dangerous goods vehicles checked before coming onto the site to ensure that they comply with regulatory requirements? 	<p>A dangerous goods vehicle checklist was not available for auditing purposes.</p> <p>Recommendation: Ensure dangerous goods vehicles are checked before entering the site.</p>	NC	NRTA (s) 32 NRTR (r) 115, 275, 277, 280, 281 HBAR (r) 14

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
60	<ul style="list-style-type: none"> Is someone trained and appointed to oversee the loading and/or off-loading of hazardous chemicals? 	<p>Training certificates are available for:</p> <ul style="list-style-type: none"> W.P Zikhali, Certificate nr. 2021/186687, Conveying of Dangerous Goods by road – PrPD [D] 2010/64, 14/12/2021, Expiry: 14/12/2022 Training Matrix, Shift D, TIS - Off-load Flocculant Bags for PWP operators, all shifts. <p>An appointment to oversee the loading and/or off-loading of hazardous chemicals was not available for auditing purposes.</p> <p>Recommendation: Ensure training is provided on hazardous chemicals and appointments made to oversee the loading/offloading of hazardous chemicals.</p>	NC	NRTR (r) 277
61	<p>How does the Site manage pests? Are pest control service providers and operators licensed?</p>	<p>Zululand Pest Control cc. is conducting pest control on a monthly basis. Certificate of approval for Tronox Fairbreeze for 28 July 2022, 7 January 2022 and 29 March 2022.</p> <ul style="list-style-type: none"> S Mathebula, Pest Control Operator, P41644. <p>Registration certificates for the service providers and operators were not available for auditing purposes. and operators</p> <p>Recommendation: Ensure the registration certificates for the operators and service provider are available for auditing purposes.</p>	NC	FFARSRA (s) 3 Norms & Standards for Premises and Acceptable Monitoring standards (s) 25 ULM Nuisances BL (s) 41

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
62	<ul style="list-style-type: none"> Have pesticides been registered and are the MSDSs available on site? 	<p>It is stated on the Certificate of approval for Tronox Fairbreeze for 28 July 2022, 7 January 2022 and 29 March 2022 that all Pesticides are registered under the FARSRA, but the pesticides used are not listed and (M)SDSs are not available / provided.</p> <p>Recommendation: Ensure the certificates / reports indicate the pesticides used and MSDSs must be available.</p>	NC	FFARSRA (s) 7
63	<p>Does the Site have electrical equipment or other equipment or materials that contain PCBs?</p> <ul style="list-style-type: none"> If yes, has it been registered? 	<p>Wearcheck Global Transformer Services Report, 2021-08-23 list all the equipment containing PCBs.</p> <p>Proof of registration was not available for auditing purposes.</p>	NC	PCB Regs (r) 5
64	<ul style="list-style-type: none"> Are materials tested and labelled? 	<p>Recommendation: Ensure proof of registration of equipment containing PCBs are available for auditing purposes.</p>	C	PCB Regs (r) 7

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
ADMINISTRATIVE				
65	How does the Site manage contractors ?	Tronox KZN Sands Contractor She File – Index & Guidelines (SHERCDOC-66-1147, Rev. 05, September 2022).	C	OHSA (s) 37 (1), (2)
66	<ul style="list-style-type: none"> Are there contracts in place for all contractors who work on the site? 	Signed contracts are in place for the following contractors: <ul style="list-style-type: none"> SGK Securit, viewed signed contract and extension, July 2017. Silby signed on 18 March 2021. 	C	CR (r) 8 OHSA (s) 37 (1), (2)
67	<ul style="list-style-type: none"> How does the Site ensure that all contractors have got workmen's compensation cover? 	Audit reports for: <ul style="list-style-type: none"> SGK Security (INC-17115-023423-001, 2022/05/07), conducted by Neil Singh. Silby Construction (INC-17115-104653-001, 24/06/2022) conducted by Neil Singh. 	C	COIDA (s) 89 ODMWA (s) 62
68	Does the Site ensure the use of registered security officers?	PSIRA Registration Certificates for the following Security Services Providers: <ul style="list-style-type: none"> Mthembu, BJ, Registration nr. 2337099, Reg date: 7/04/2014, Grade: C, Valid until: 09/09/2023. Nxumalo, BH, Registration nr. 1625913, Reg date: 20/09/2008, Grade: B, Valid until: 27/09/2023. Cele, S, Registration nr. 2160927, Reg date: 26/10/2012, Grade: B, Valid until: 23/08/2023. 	C	SOA (s) 10

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
69	Is there an agreement in place between management and the union regarding the appointment of health and safety representatives ?	Occupational Health and Safety Procedural Agreement, CPDOC- 39-308, 25 November 2020.	C	GAR (r) 6 MHSA (s) 26, 27, 29 MHSA GN R93 (Chapter) 6 MA GN R992 (r) 2.18
70	Has a competent person been appointed as Safety Officer ?	IM Ndlovo, Certificate nr: 951538/201231019 (BT1653), S2.1.7.4 appointment letter as Chief Safety Officer, 26 August 2021, Signed by: S. Pooron, Mine Manager, S3.1(a). Qualifications attached to the letter. Neil Singh, Safety Officer, S7.4 appointment letter as Safety Officer, 26 August 2021, Signed by: S. Pooron, Mine Manager, S3.1(a). Neil Singh, UNISA, National Diploma in Safety Management, 9 April 2019.	C	MA GNR 992 (s) 2.17
71	Are Health and Safety Representatives appointed and trained ?	The following SHE Rep appointments with training records were provided: <ul style="list-style-type: none"> PM Msweli, 27 September 2022, SHE Rep training Certificate, 25/0/2022. 	C	OHSA (s) 17 / MHSA (s) 29 MA GN R992 (r) 2.18 GAR (r) 7
72	Are workplace inspections done and how are the non-conformances actioned?	Job ticket order nr. 931794754/0010/KS01, Monthly inspection plant hygiene – Fairbreeze Infrastructure and RSF, 26/09/2022, Owen Lekhuleni, legal appointee.	C	MA GN R992 (r) 2.19

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
73	Are changehouse record book inspections conducted? Is it conducted by a competent person?	Job ticket order nr. 931794754/0010/KS01, Monthly inspection plant hygiene – Fairbreeze Infrastructure and RSF, 26/09/2022, Owen Lekhuleni, legal appointee.	C	MA GNR 992 (s) 4.4
74	Has a Safety Committee been established and do members attend the meetings?	KZN Sands SHE Committee Structure (v.7, CPDOC-39-309, 12 APRIL 2021).	C	MHSA (s) 34
75	<ul style="list-style-type: none"> Do Health and Safety meetings take place at the required intervals? Are there minutes kept of the health and safety meetings? 	<p>Level 2 SHE Committee Meeting Minutes, PWP Production, MININGDOC-47-796, 19 October 2022.</p> <p>Level 2 SHE Committee Meeting Minutes, PWP Production, MININGDOC-47-796, 23 November 2022.</p> <p>Observation: Ensure minutes of at least two SHE Committee meetings, with an attendance register, are available for auditing purposes.</p>	C	MHSA (s) 35

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
76	<ul style="list-style-type: none"> Are management representatives (Committee Members) appointed and attend the meetings? 	<p>K Mathenjwa, Appointed Assistant to the Manager of Fairbreeze Mine, 24 January 2019, as co-opted employer representative.</p> <p>Neil Singh, Safety Officer, S7.4 appointment letter as Employer Representative, 26 August 2021, Signed by: S. Pooron, Mine Manager, S3.1(a).</p> <p>Observation: Ensure minutes of at least two SHE Committee meetings, with an attendance register, are available for auditing purposes.</p>	C	MHSA (s) 34
77	Are appointments made for the investigation of incidents on behalf of the employer?	<p>Neil Singh, Safety Officer, S7.4 appointment letter as Employer Representative, 26 August 2021, Signed by: S. Pooron, Mine Manager, S3.1(a).</p> <p>Observation: Ensure the appointment letter specific reference to incident investigation.</p>	C	GAR (r) 9

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
78	Are the necessary MHSA appointments in place?	<p>S Poorun, Site Leader, Appointed S3(1)(a) and Mine Manager, 25 June 2018, appointed by Mpho Mothoa, Regional Manager South Africa, S2A(1) appointee (copy of appointment not provided.).</p> <p>SC Magwaza, Manager Mine Production, Appointed S2.6.1 as subordinate manager, 17 January 2019.</p> <p>S Govender, Resident Engineer, Appointed S2.13.1 as Engineer, 10 March 2022.</p> <p>K Mathemjwa, Mine Shift Supervisor (Shift A), Appointed S2.9.2, Shift Supervisor, 24 January 2019.</p> <p>WP Crawford, Mine Surveyor, Appointed S17.2(d) as Mine Surveyor, 31 May 2015.</p>	C	MHSA (s) 4 MHSR (r) 17.2
79	<p>Within 7 days of the CEO appointment, did the Site notify the Chief Inspector of Mines (in writing) thereof? The letter must include -</p> <ul style="list-style-type: none"> • the name of the CEO • the nature of his/ her function • names of managers under the CEO's supervision 	<p>Proof of submission to the DMR Aramex Courier, reference nr. 40073218905 on 27/10/2017. The waybill did not have a receipt date. The DMR was not notified within 7 days of the CEO appointment.</p> <p>Recommendation: Ensure relevant documents are hand delivered and signed for by the DMR within the specified periods.</p>	NC	
CONSTRUCTION				

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
80	Is construction taking place on site and are all relevant documentation in place?	<p>RODCOL manages the extension of the rehabilitation shed. Sampled a typical construction related file, and the template to check the project file content/ completeness / compliance after discussion with Zaheer Sabat.</p> <p>The contractors are not allowed on site, if the checklist is not signed off as complete and in order.</p> <p>Observation: Ensure records are available for auditing purposes.</p>	C	CR
81	<ul style="list-style-type: none"> Has the Site obtained a permit for the construction work? 	<p>Not available for auditing purposes.</p> <p>Recommendation: Ensure records are available for auditing purposes.</p>	NC	CR (r) 3
82	<ul style="list-style-type: none"> Has the relevant authority been notified of the construction? 	<p>Not available for auditing purposes.</p> <p>Recommendation: Ensure records are available for auditing purposes.</p>	NC	CR (r) 4

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
83	<ul style="list-style-type: none"> Are the necessary appointments in place? 	<p>Appointments for RODCOL viewed:</p> <ul style="list-style-type: none"> Walter Nuhl, CEO, S16(1) appointee, 04/01/2022. Travis Thurston, S8(1) Construction manager, 04/01/2022. Sibusiso Ntombela on 04/01/2022, as the: <ul style="list-style-type: none"> S8(7) Construction Supervisor S1(K) Construction and Mobile Plant Operator S14(2) Scaffolding Supervisor, S10 Form and Support Work Supervisor S19(8)(a) Material Hoist Supervisor S14(1) Demolition Work Supervisor S13(1)(a) Excavation Supervisor SSR 2 PPE Inspector GSR S28(a) Stacking and Storage Supervisor Thilani Mkhize on 04/01/2022 as the: <ul style="list-style-type: none"> S17(1) SHE Rep S3(4) First aider ER S9(1) Fire Team Member Christina Chetty on 04/01/2022 and the: <ul style="list-style-type: none"> S9(1) Incidents/accident investigator S9(1) as Risk Assessor 	C	CR
PHYSICAL STRESSORS				
84	Is access to the site controlled?	The site is access controlled, and permission is required to go into the mining area and PWP plant.	C	GSR (r) 2C MA GNR 992 (s) 3.1, 20.3

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
85	Is there a drug and alcohol policy and is it enforced?	Tronox KZN Sands Alcohol & Drug testing Procedure, CPDOC-56-8, v. 23, 11 Jan 2021. Observation: Drug testing is not performed during medicals.	C	GSR (r) 2A
86	Does the site have a smoking policy ?	Smoking Policy at Tronox KZN Sands, CPDOC-51-112, v. 3, Print date:6 May 2019	C	TPCA Reg (r) 8
87	<ul style="list-style-type: none"> Are smoking areas demarcated and is signage displayed? 	Viewed the demarcated smoking areas with the displayed signage.	C	TPCA Reg (r) 3 TPCA Reg (r) 6
88	<ul style="list-style-type: none"> Are "No Smoking" signs displayed at the entrance to buildings? 	A "no smoking" sign was not displayed at the entrances of the Fairbreeze offices. Recommendation: Ensure the "no smoking" signs are displayed at the entrances of all buildings.	NC	TPCA (s) 2 TPCA Reg (r) 7
89	Is there safety signage/information displayed in the workplace?	Observed safety signage and information displayed all over the site.	C	GSR (r) 2B HBAR (r) 13 MA Regs (s) 16.49 ULM Fire Prevention BL (s) 18
90	<ul style="list-style-type: none"> Have noise zones been demarcated? 	Noise zones are demarcated.	C	NIHL Regs (r) 9

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
91	<ul style="list-style-type: none"> Have respirator zones been demarcated? 	Respirator zones are demarcated.	C	HCAR (r) 8
92	<ul style="list-style-type: none"> Are regulated asbestos areas demarcated? 	No asbestos on site.	C	AAR (r) 18
93	<ul style="list-style-type: none"> Has the Site demarcated and restricted entry to radioactive areas? 	Restricted entry to radioactive areas are demarcated.	C	NNRR (r) 4.9

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
94	Are there procedures in place with regards to high risk work ?	<p>KZN Sands Safe Way Manual, CPDOC-39-410, v. 2, 12 April 2021, provide a procedure to manage high risk work:</p> <ul style="list-style-type: none"> ● Risk Assessment ● Permit to work ● Clearance Certificates for: <ul style="list-style-type: none"> ○ Working at heights ○ Hot work ○ Confined Space ○ Excavation and Penetration ○ Radiation Area ● Isolations ● Locks, Tags and Tapes ● Training ● Audits <p>Acknowledgement form for communication of Mining Production High Risk Summary and Controls.</p> <p>Standard Task Procedure for:</p> <ul style="list-style-type: none"> ● Starting and stopping of Monitor Booster Pumps, MININGDOC-56-97, v. 10, 2022.06.02. ● Operating a Monitor Gun, MININGDOC-71-19, v. 10, 2020.03.02 	C	MHSR (r) 8.8

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
95	<ul style="list-style-type: none"> Are there confined space entry procedures in place and is testing equipment calibrated? 	<p>KZN Sands Safe Way Manual (CPDOC-39-410, v. 2, 12 April 2021, par. 1.4).</p> <p>Calibration Certificates not available at the time of the audit.</p> <p>Observation: The Site needs to ensure that testing equipment is calibrated at all times.</p>	C	GSR (r) 5
96	<ul style="list-style-type: none"> Are there procedures in place for working at heights? Have these been designed by a qualified person? 	<p>KZN Sands Safe Way Manual (CPDOC-39-410, v. 2, 12 April 2021, par. 6.1).</p>	C	GSR (r) 6 CR (r) 10
97	<ul style="list-style-type: none"> Have employees who work at heights been trained, and do they have a medical certificate? 	<p>Acknowledgement form for communication of Mining Production High Risk Summary and Controls.</p> <p>Medical Fitness Certificate for DUMISANI SIMANGALISO CELE.</p>	C	GSR (r) 6
98	<ul style="list-style-type: none"> Are there procedures in place for working in danger of engulfment? 	<p>KZN Sands Safe Way Manual (CPDOC-39-410, v. 2, 12 April 2021, par. 1.4). Definition includes engulfment.</p>	C	GSR (r) 7
99	<ul style="list-style-type: none"> Are there hot work procedures in place and are permits issued for such work? 	<p>KZN Sands Safe Way Manual (CPDOC-39-410, v. 2, 12 April 2021, par. 1.2).</p>	C	GSR (r) 9 DMR (r) 8

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
100	Are ladders/scaffolding on a register, inspected and maintained?	<p>Fairbreeze Statutory Maintenance Plans, 2020 lists the ladders (THK-FBR-INF-BLD-001-LDR, THK-FBR-INF-BLD-004-LDR, THK-FBR-INF-BLD-008-LDR). All inspections are actioned from SAP. Evidence of inspection was not available for auditing purposes.</p> <p>Scaffolds were observed at the PWP with tags to indicate inspection.</p> <p>Observation: Ensure inspection records are available.</p>	C	GSR (r) 13A
101	Are the workplace facilities inspected regularly and maintained as per regulatory requirements?	<p>Fairbreeze Statutory Maintenance Plans, 2020 indicates all the statutory inspections on facilities (SAP).</p> <p>She Rep inspection for PWP, 09/0/2022 and Job ticket order nr. 931794754/0010/KS01, Monthly inspection plant hygiene – Fairbreeze Infrastructure and RSF, 26/09/2022, Owen Lekhuleni, legal appointee.</p> <p>Observed that the facilities are well maintained.</p>	C	FR (r) 9 MA GN R992 (r) 2.19
102	Do you have a procedure for the identification and selection of PPE ?	<p>PPE requirements are defined in the Tronox KZN Sands Baseline SHERC HIRA Aspect and Impact Register (SHERCDOC-66-822, v. 8, 2022), and STPs.</p> <p>Procedure for PPE at KZN Sands, CPDOC-39-298, v. 8, 19 August 2019.</p>	C	GSR (r) 2 HCAR (r) 11 HBAR (r) 11 MHSA (s) 6;

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
103	<ul style="list-style-type: none"> Is personal protective equipment (PPE) issued, controlled and maintained? 	<p>Documented proof for the issuance, control and maintenance of PPE was not requested for auditing purposes.</p> <p>Observation: Ensure records are available for the issuance, control and maintenance of PPE.</p>	C	GSR (r) 2 HCAR (r) 11 HBAR (r) 11 MHSA (s) 6
104	<ul style="list-style-type: none"> Is contaminated PPE stored separately? 	<p>Procedure for PPE at KZN Sands, CPDOC-39-298, v. 8, 19 August 2019.</p>	C	HCAR (r) 11 HBAR (r) 11
105	<ul style="list-style-type: none"> Are employees trained on the use of PPE? 	<p>Procedure for PPE at KZN Sands, CPDOC-39-298, v. 8, 19 August 2019.</p> <p>Observation: Ensure records are available for the training on the use of PPE.</p>	C	GSR (r) 2 HCAR (r) 11
106	<p>Does the Site submit an annual Occupational Hygiene report to the DMR</p>	<p>Proof of submission of the annual Occupational Hygiene report to the DMR, 31 October 2022:</p> <ul style="list-style-type: none"> MCOP for an occupational health programme for noise. MCOP for the management of medical incapacity due to ill health and injury. <p>Recommendation: Ensure proof of submission is available for auditing purposes.</p>	NC	MHSA (s) 16.1

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
107	Is the workplace assessed and monitored for thermal stresses ?	A Heat Stress Survey at the Fairbreeze Mine, NOSA REPORT NO: 21231LB03.Q4, 06 DECEMBER 2021.	C	ERW (r) 2 MHSA (s) 12
108	<ul style="list-style-type: none"> Are control measures implemented where necessary? 		C	ERW (r) 2
109	Are lighting surveys done?	An Illumination Survey At The Fairbreeze Mine, NOSA Report No: 22048mp02.Q1, 30 March 2022. A Vehicle Illumination Survey At The Fairbreeze Mine, NOSA Report nr. 22048MP01.Q2, 01 June 2022.	C	ERW (r) 3 MHSA (s) 12
110	Are noise risk assessments conducted to determine exposure?	A Noise Survey At The Fairbreeze Mine, NOSA Report No. 22048MP05.Q2, 27 JUNE 2022. An Evaluation Of Personal Noise Exposures At The Fairbreeze Mine, NOSA REPORT NO: 22048MP06.Q1, 28 TO 30 MARCH 2022.	C	NIHL Regs (r) 6
111	<ul style="list-style-type: none"> Are control measures implemented where necessary? 	Observed demarcated noise zones and compulsory wearing of earplugs. Observation: Ensure proof of implementation of control measures is available for auditing purposes.	C	NIHL Regs (r) 10

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
112	<ul style="list-style-type: none"> Is occupational hygiene noise monitoring done? 	<p>A Noise Survey At The Fairbreeze Mine, NOSA Report No. 22048MP05.Q2, 27 JUNE 2022.</p> <p>An Evaluation Of Personal Noise Exposures At The Fairbreeze Mine, NOSA REPORT NO: 22048MP06.Q1, 28 TO 30 MARCH 2022.</p>	C	<p>NIHL Regs (r) 7</p> <p>MHSA (s) 12</p> <p>MHSA GN R93 (s) 11.4</p>
113	<ul style="list-style-type: none"> Is exposure monitoring done by an approved inspection authority? 	<p>Mark Pretorius, Registered Occupational Hygiene Technologist (ROHT) – SAIOH Membership Certificate No. 1682.</p> <p>J. Jooste, Registered Occupational Hygienist (SAIOH Membership No. 0629)</p>	C	<p>NIHL (r) 7</p> <p>ODMWA (s) 15 - 25</p>
114	<ul style="list-style-type: none"> Are exposure monitoring records kept? 	<p>An Evaluation Of Personal Noise Exposures At The Fairbreeze Mine, NOSA REPORT NO: 22048MP06.Q1, 28 TO 30 MARCH 2022.</p>	C	<p>NIHL Regs (r) 11</p>
115	Are chemical risk assessments conducted to determine exposure of employees?	<p>An Airborne Pollutants Survey At The Fairbreeze Mine, NOSA Report No: 22048mp05.Q1, 28 To 30 March 2022, And Nosa Report No: 22048mp02.Q2, 30 May To 02 June 2022.</p> <p>A Continuous Health Risk Assessment At The Fairbreeze Mine, NOSA Report No: 21116lb10.Q4, 02 To 04 November 2021.</p>	C	<p>HCAR (r) 5</p> <p>MHSA (s) 12</p>
116	<ul style="list-style-type: none"> Are control measures implemented where necessary? 	<p>Appropriate PPE is provided and used.</p>	C	<p>HCAR (r) 10</p>

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
117	<ul style="list-style-type: none"> ● Is control equipment inspected and tested as per required intervals? <ul style="list-style-type: none"> ○ By an approved inspection authority? 	<p>BA Sets are tested in accordance with the maintenance plan on SAP (Fairbreeze Statutory Maintenance Plans, 2020).</p> <p>It could not be established if inspections are conducted by an approved inspection authority as service records were not available for verification at the time of the audit.</p> <p>Recommendation: Control equipment needs to be inspected by an approved inspection authority.</p>	NC	HCAR (r) 12
118	<ul style="list-style-type: none"> ● Is exposure monitoring done? <ul style="list-style-type: none"> ○ By an approved inspection authority? 	<p>An Airborne Pollutants Survey At The Fairbreeze Mine -</p> <ul style="list-style-type: none"> ● NOSA Report No: 22048mp05.Q1 (28 to 30 March 2022) ● Nosa Report No: 22048mp02.Q2 (30 May to 02 June 2022) ● J. Jooste, Registered Occupational Hygienist (SAIOH Membership No. 0629). 	C	HCAR (r) 6
119	<ul style="list-style-type: none"> ● Are exposure monitoring records kept? 	Quarterly reports available.	C	HCAR (r) 9
120	Have biological agents present on the Site been identified and classified?	Hazardous Biological Agents Survey at the Fairbreeze Mine (1 April 2022, Report No: 22048MP01.Q1 NOSA Occupational Hygiene Services).	C	HBAR (r) 3

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
121	<ul style="list-style-type: none"> Are biological hazard assessments conducted to identify and determine exposure of employees? <ul style="list-style-type: none"> By a competent person? 	Hazardous Biological Agents Survey at the Fairbreeze Mine (1 April 2022, Report No: 22048MP01.Q1 NOSA Occupational Hygiene Services) -	C	HBAR (r) 6
122	<ul style="list-style-type: none"> Are control measures implemented where necessary? 	<ul style="list-style-type: none"> Steven M Pretorius, Occupational Hygiene Technologist, SAIOH Member nr. 54999883, Certificate ID: 54999883-23314. 	C	HBAR (r) 10
123	<ul style="list-style-type: none"> Is exposure monitoring done? <ul style="list-style-type: none"> By a competent person? 	<p>A Continuous Health Risk Assessment at The Fairbreeze Mine (NOSA Occupational Hygiene Services, 02 TO 04 NOVEMBER 2021, REPORT NO: 21116LB10.Q4) -</p> <ul style="list-style-type: none"> Jacques Jooste, Occupational Hygienist, SAIOH Member nr. 0629, Member ID: 33914727, Certificate ID: 33914727-20999, Valid until 31 January 2022. <p>Observation: Ensure implemented procedures regarding the control measures, machinery and facilities in terms of biological agents are available.</p>	C	HBAR (r) 7
124	<ul style="list-style-type: none"> Are exposure monitoring records kept? 	Reports were available and viewed.	C	HBAR (r) 9

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
125	Is exposure to dust monitored?	<p>An Airborne Pollutants Survey At The Fairbreeze Mine -</p> <ul style="list-style-type: none"> • NOSA Report No: 22048mp05.Q1 (28 to 30 March 2022) • Nosa Report No: 22048mp02.Q2 (30 May to 02 June 2022) • J. Jooste, Registered Occupational Hygienist (SAIOH Membership No. 0629). 	C	ERW (r) 5
126	Is radiation/irradiation exposure monitored?	<p>KZN Mandatory COP for Minimum Standards of Fitness to Perform Work at a Mine (CPDOC-51-72, February 2022).</p> <ul style="list-style-type: none"> • Worker Safety Assessment For Tronox KZN Sands (SHERCDOC-68-2738, v.1, 07 / 02 / 2021, Section 7.2) indicates that MSP being a Radiation Supervised area, workers from the MSP are regarded as Occupationally Exposed Persons (OEPs). PWP is not mentioned. <ul style="list-style-type: none"> ○ Acknowledgement of receipt and approval, NNR, LB/35/6/11/43 (Our Reference: COR43B0309, Your Reference: COR43A0355, 18/03/22). • SOP for Medical Surveillance of Radiation exposed workers examinations (CPDOC-51-105). • CPC TRONOX MS list -Final revision. <p>Observation: Ensure PWP is mentioned in all the procedures..</p>	C	Control of Electronic Products Regs (r) 5

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
127	<p>Are ergonomics assessments being conducted?</p> <ul style="list-style-type: none"> By a competent person? 	<p>A Continuous Health Risk Assessment at The Fairbreeze Mine (NOSA Occupational Hygiene Services, 02 TO 04 NOVEMBER 2021, REPORT NO: 21116LB10.Q4) -</p> <ul style="list-style-type: none"> Jacques Jooste, Occupational Hygienist, SAIOH Member nr. 0629, Member ID: 33914727, Certificate ID: 33914727-20999, Valid until 31 January 2022. <p>Observation: Suggest doing a dedicated ergonomics survey in each area of operations.</p>	C	ER (r) 6
128	<ul style="list-style-type: none"> Are control measures implemented where necessary? 	<p>Proof of the implementation of control measures was not available for auditing purposes.</p> <p>Recommendation: Ensure proof of implementation of control measures is available for auditing purposes.</p>	NC	ER (r) 7
129	<ul style="list-style-type: none"> Are records kept? 	<p>Reports were available and viewed.</p>	C	ER (r) 10
130	<p>Has the measuring equipment, used for the occupational health surveys, been calibrated?</p>	<p>Where applicable, calibration certificates and a summary of the equipment used are available in each of the reports as appendices and a table titled "Instrumentation".</p>	C	LMA (s) 24
ELECTRICAL & MACHINERY				
131	<p>Does the site adhere to good housekeeping practices?</p>	<p>Housekeeping in general on site is good.</p>	C	ERW (r) 6

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
132	Are tools maintained to ensure safety in use?	<p>Fairbreeze Statutory Maintenance Plans, 2020 lists the electrical equipment and tools, with the maintenance schedules.</p> <p>Use of tag system to indicate if the tools / equipment has been maintained. Observed tagged equipment with the yellow tag.</p>	C	GSR (r) 2
133	Is there lifting equipment on site and are the safe work loads and manufacturers ID plates displayed?	Observed lifting equipment on site, safe loads and manufacturers ID are displayed.	C	DMR (r) 18 MHSR (r) 8.5
134	<ul style="list-style-type: none"> • Is the equipment serviced, load tested and inspected and the required intervals? <ul style="list-style-type: none"> ○ By a competent person? 	<p>Fairbreeze Statutory Maintenance Plans, 2020 lists the lifting equipment.</p> <ul style="list-style-type: none"> • Scaw Certificate of Test and Examination (Certificate nr. 367883. 4 Ton PALfinger crane truck IVEO 150/E24 Reg nr NUF1712, 03/02/2022, Certified by V Mangray, LMI 2008120107, LME 180), • Scaw Certificate of test and examination (Test Certificate No. 367373, 5 Ton Crawl Beam B - PWP workshop, 26/01/2022, Certified by V Mangray, LME: 180, LMI-2008120107). 	C	MHSR (r) 8.5, 8.8, 8.9

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
135	<ul style="list-style-type: none"> ● Is lifting tackle on a register and inspected at the required intervals? <ul style="list-style-type: none"> ○ By an appointed person? 	<p>Fairbreeze Statutory Maintenance Plans, 2020 lists the lifting equipment.</p> <p>Use of tag system to indicate if the tools / equipment has been maintained. Observed tagged equipment with the yellow tag.</p>	C	
136	<ul style="list-style-type: none"> ● Are there safe operating procedures for lifting equipment? 	<p>Procedure for the handling of Lifting Equipment at Fairbreeze Mine, MININGDOC-56-53, v. 6, May 2010.</p>	C	
137	<ul style="list-style-type: none"> ● Are lifting equipment operators appointed? 	<p>The appointment letters for lifting equipment operators were not available for auditing purposes.</p> <p>Recommendation: Ensure appointment letters for the lifting equipment operators are available.</p>	NC	

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
138	<ul style="list-style-type: none"> Do lifting equipment operators have in their possession, their licence to operate the machine? 	<p>Sithule G Mhlango:</p> <ul style="list-style-type: none"> Starcrow training and consulting services, Certificate: TETA/2021/03/FWS106238, Accreditation nr. TETA04-223, Electric Chain Hoist, 03/03/2021, Expiry date: 02/03/2023. Licence No.TETA/2021/03/FWS106238, Ass. No. TETA-ASSR15-61. <p>Davadasen Naidoo:</p> <ul style="list-style-type: none"> Starcrow training and consulting services, Certificate: TETA/2021/03/FWS106645, Accreditation nr. TETA04-223, Electric Chain Hoist, 18/03/2021, Expiry date: 17/03/2023. Licence No.TETA/2021/03/FWS106645, 18/03/2021, Expiry date: 17/03/2023. 	C	
139	<ul style="list-style-type: none"> Are pre-use inspections conducted? 	<p>Pre-use inspection of all vehicles and equipment is conducted. Sampled the pre-use inspection for LUV vehicle, 22/10/2022.</p> <p>Observation: Ensure pre-use inspection for lifting equipment is available for auditing purposes.</p>	C	
140	Is machinery adequately guarded /fenced/demarcated/identified?	Observed well guarded, fenced, demarcated, identified machinery.	C	GMR(r) 3

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
141	Has the Site implemented measures to ensure that no person suffers from electrical shock , arc flashes or electrocution?	<p>KZN Sands Safe Way Manual, CPDOC-39-410, v. 2, 12 April 2021, provide a procedure to manage high risk work:</p> <ul style="list-style-type: none"> ● Risk Assessment ● Permit to work ● Clearance Certificates for: <ul style="list-style-type: none"> ○ Working at heights ○ Hot work ○ Confined Space ○ Excavation and Penetration ○ Radiation Area ● Isolations ● Locks, Tags and Tapes ● Training ● Audits 	C	MHSA Regs (r) 3.2, 3.3
142	Are electrical apparatus clearly marked with the maximum voltage that may be present therein?	Observed electrical apparatus clearly marked with the maximum voltage indicated. Electrical control gear were labelled, in good condition and kept closed.	C	MHSA Regs (r) 3.12
143	Are electrical control gear labelled, in good condition and kept closed?		C	EMR (r) 8
144	Does the site have measures in place to ensure that machinery/electrical installations are maintained and inspected ?	Fairbreeze Statutory Maintenance Plans, 2020. Joc cards are issued (Viewed completed job cards).	C	EIR (r) 2

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
145	Have all designs of electrical apparatus (machine and fittings in which conductors are used, or of which they form a part) and electrical reticulation systems been approved by, are under the control of and are installed, repaired and maintained by a competent person ?	S Govender, Resident Engineer, Appointed S2.13.1 as Engineer, 10 March 2022. Competency: Electrical Engineer's Certificate of Competency, 4307, 18 January 2018.	C	MHSA Regs (r) 3.1, 3.14
146	Has the Site appointed a competent/registered person/contractor to be responsible for electrical installations?	S Govender, Resident Engineer, Appointed S2.13.1 as Engineer, 10 March 2022. <ul style="list-style-type: none"> Competency: Electrical Engineer's Certificate of Competency, 4307, 18 January 2018. 	C	GMR (r) 2 MA GNR 992 (s) 2.13
147	Are operators of machinery trained?	Matrix -PWP for Fairbreese, indicates training provided on various operating procedures including STP - Operate Monitor Gun at PWP and on the COP TMM.	C	GMR (r) 4
148	Has the site identified machinery that requires operation by certified staff? And do you have measures in place to ensure it is operated accordingly?	Mandatory COP for Trackless Mobile Machines (MININGDOC-53-7, v. 11, 24 August 2017). STP are developed, approved training provided and PTOs performed to declare a person competent. Observation: Ensure records are available on operator certification and training.	C	MHSA Regs (r) 8.8

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
149	Are emergency stop buttons available on moving machinery?	Observed emergency stop buttons on machinery and equipment.	C	GMR (r) 6
150	Is portable electric equipment on a register and maintained?	Fairbreeze Statutory Maintenance Plan, 2020 lists all the equipment and SAP asset register with the inspection and maintenance schedules. Use of tag system to indicate if the tools / equipment has been maintained. Observed tagged equipment with the yellow tag.	C	EMR (r) 10
151	Are Certificates of Compliance (COC) for electrical installations available for the site?	COCs are in place. <ul style="list-style-type: none"> Fairbreeze Mine, Sand Tails Sands Lighting DB 31204 FE/K01, ECA 637986, A Ferreira, IE29064, 14/09/2015, signed 15/03/2016. Desliming DB 31202, FE/K01, ECA 637988, 15/03/2016. 	C	EIR (r) 7
152	Is the electrical contractor registered with the relevant authority?	Electrical contractor nr. KZN1931 (14/09/2015)	C	EIR (r) 6

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
153	Are procedures implemented for energising, de-energising and isolation of electrical apparatus (lock-out)?	<p>KZN Sands Safe Way Manual, CPDOC-39-410, v. 2, 12 April 2021, provide a procedure to manage high risk work:</p> <ul style="list-style-type: none"> ● Risk Assessment ● Permit to work ● Clearance Certificates for: <ul style="list-style-type: none"> ○ Working at heights ○ Hot work ○ Confined Space ○ Excavation and Penetration ○ Radiation Area ● Isolations ● Locks, Tags and Tapes ● Training ● Audits 	C	EMR (r) 4 MA GNR 992 (r) 20.9
154	Are there boilers and/or pressure vessels on site and are they registered?	<p>Pressure vessels are listed in the SAP CPC Asset registers and scheduled maintenance plans, 2020 with the maintenance schedule.</p> <p>All pressure vessels are registered.</p> <ul style="list-style-type: none"> ● Air receiver, ILS 5674, Plant no. RVR. 002. 	C	MA GNR 992 (r) 23.2
155	<ul style="list-style-type: none"> ● Are the nameplates of pressure vessels clearly visible and does it contain the required information? 	The name plates on the pressure vessels are clearly visible with the required information (Photographic evidence).	C	MA GNR 992 (r) 23.3

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
156	<ul style="list-style-type: none"> • Are pressure vessels tested/maintained? <ul style="list-style-type: none"> ○ By an approved inspection authority? 	<p>Air receiver, ILS 5674, Plant no. RVR. 002, PCD / QCP No: PCD7.1 (B) Rev. 0, Pressure Vessel Statutory Inspection Report, 24 Month inspection and test, 28 July 2022. SAIBA Engineering cc., LVUP 059.</p> <p>Air receiver, ILE 5517, Plant no. RVR. 003, PCD / QCP No: PCD7.1 (B) Rev. 0, Pressure Vessel Statutory Inspection Report, 24 Month inspection and test, 28 July 2022. SAIBA Engineering cc., LVUP 059.</p>	C	MA GN R992 (r) 23.12
157	<ul style="list-style-type: none"> • Are records kept? 	<p>Air receiver, ILS 5674, Plant no. RVR. 002, PCD / QCP No: PCD7.1 (B) Rev. 0, Pressure Vessel Statutory Inspection Report, 24 Month inspection and test, 28 July 2022. SAIBA Engineering cc., LVUP 059.</p> <p>Air receiver, ILE 5517, Plant no. RVR. 003, PCD / QCP No: PCD7.1 (B) Rev. 0, Pressure Vessel Statutory Inspection Report, 24 Month inspection and test, 28 July 2022. SAIBA Engineering cc., LVUP 059.</p>	C	MA GNR 992 (r) 23.4
158	Are Trackless Mobile Machinery (TMM) fitted with detection warning to prevent collision with other diesel powered mobile machinery?	<p>Trackless Mobile Machinery (TMM) are not fitted with detection warning to prevent collision.</p> <p>Recommendation: Ensure TMMs are not fitted with detection warning to prevent collision.</p>	NC	MH SR GNR 93 (r) 8.10

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
159	Do TMM operators possess a licence which is valid for 2 years, for the vehicle being operated and are they appointed in writing?	<p>Dumisani M Makhatini (Scribante):</p> <ul style="list-style-type: none"> ● Appointment letter to Operate, Excavator, Fairbreeze Mine, 10/08/2022. ● Driver's Appointment Card, Fairbreeze, 2022/08/02, Renewal date: 2023/02/10. <p>MH Sanders (Scribante):</p> <ul style="list-style-type: none"> ● Appointment letter to Operate TMMs, Fairbreeze Mine, 18/010/2021. ● Driver's Appointment Card, LDV, Fairbreeze / Hillendale, 2021/09/22, Renewal date: 2023/09/21. 	C	
160	Are TMMs inspected before use?	All vehicles are inspected prior to use, sampled Ford LUV, Inspection book, 5/7/2022.	C	
161	Is there a procedure for the safe use and operation of TMMs?	Mandatory COP for Trackless Mobile Machines (MININGDOC-53-7, v. 11, 24 August 2017).	C	
MEDICALS				

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
162	Are there procedures in place to address consent of employees to medical attention, confidentiality , and the safe storage of medical records?	<p>SOP Regarding the Confidentiality of Medical Information (CPDOC-51-90, v. 3, Implementation date: October 2006, Print date: 27 October 2022).</p> <p>The procedure does not clearly indicate how the safe storage of medical records are managed. A locked cabinet, where some of the medical records are stored, was observed. It was indicated that all the records are kept on the server provider's server, with password access.</p> <p>Observation: Provide clear indication of the safe storage of medical records.</p>	C	NHA (s) 6, 7, 14, 15, 16, 17 BCEA (s) 90 EEA (s) 7
163	How does the clinic manage medicals to ensure that all employees are assessed as required and for the correct condition? Does the Site have a medical surveillance system in place?	<p>KZN Mandatory COP for Minimum Standards of Fitness to Perform Work at a Mine (CPDOC-51-72, February 2022).</p> <ul style="list-style-type: none"> • Worker Safety Assessment For Tronox KZN Sands (SHERCDOC-68-2738, v.1, 07 / 02 / 2021, Section 7.2) indicates that MSP being a Radiation Supervised area, workers from the MSP are regarded as Occupationally Exposed Persons (OEPs). PWP is not mentioned. <ul style="list-style-type: none"> ◦ Acknowledgement of receipt and approval, NNR, LB/35/6/11/43 (Our Reference: COR43B0309, Your Reference: COR43A0355, 18/03/22). • SOP for Medical Surveillance of Radiation exposed workers examinations (CPDOC-51-105). • CPC TRONOX MS list -Final revision. 	C	OHSA (s) 12 MHSA (s) 13
164	<ul style="list-style-type: none"> • Are persons exposed to HCAs included in the medical surveillance system? 		C	HCAR (r) 7
165	<ul style="list-style-type: none"> • Are persons exposed to HBA's included in the medical surveillance system? 		C	HBAR (r) 8

ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
166	<ul style="list-style-type: none"> Are persons exposed to radiation from radioactive sources included in the medical surveillance system? 	<p>Recommendation: Ensure PWP is included in the Worker Safety Assessment for Tronox KZN Sands.</p>	C	Group IV Hazardous Substances Regs (r) 15
167	<ul style="list-style-type: none"> Are persons exposed to nuclear radiation included in the medical surveillance system? <ul style="list-style-type: none"> Has this been submitted to the NNR for approval? 		C	NNRR (r) 4.11
168	<ul style="list-style-type: none"> Do employees involved in risk work on the mine, have a Certificate of Fitness? 	<p>CPC TRONOX MS list -Final revision.</p> <ul style="list-style-type: none"> Medical Fitness Certificate for DUMISANI SIMANGALISO CELE. Tronox KZN Sands template of Exit certificate. <ul style="list-style-type: none"> Sample of Exit Medical Certificate provided. <p>Recommendation: Ensure records are available for service records of employees who perform work requiring medical surveillance</p>	C	ODMWA (s) 15
169	<ul style="list-style-type: none"> Does the Site have measures in place to ensure that medical surveillance is done on employees that are exposed to silica dust at an initial examination, periodic examinations and an exit examination? 		C	MHSA GN R93 (s) 11.7
170	<ul style="list-style-type: none"> Does the Site ensure that employees that have to undergo medical surveillance, are given exit medicals within 30 days after their termination 		C	MHSA (s) 17



ITEM	AUDIT QUESTIONS	EVIDENTIARY PROOF OF COMPLIANCE / OUTCOMES	COMPLIANCE STATUS	APPLICABLE LEGISLATION
171	<ul style="list-style-type: none"> Does the site keep service records of employees who perform work requiring medical surveillance. Have copies of these records been provided to the Inspector? 		NC	MHSA (s) 14
172	<ul style="list-style-type: none"> Does the medical practitioner compile and submit an annual report analysing the health of employees? 	<p>DMR 165, Annual Medical Report for the year 2021, Fairbreeze Mine, Tronox KZN Sand.</p> <p>Recommendation: Ensure proof of submission of the signed report is available.</p>	NC	MHSA (s) 16
173	How is medical waste managed and are the necessary certificates and permits available?	<p>Procedure for waste management, CPDOC-40-70, v. 9, 12 APRIL 2021.</p> <ul style="list-style-type: none"> Tronox KZN Sand, OTHER DEPARTMENTS - WASTE INVENTORY. <p>Medical waste is taken to the appointed medical practitioner's premises and collected and disposed of by a certified service provider. Records are maintained by the Paramedic.</p> <p>Observation: Ensure proof of disposal not available for auditing purposes.</p>	C	Norms and Standards Regulations Applicable to Different Categories of Health Establishments (s) 9

8. IMPROVEMENT OPPORTUNITIES

All information included in Section 7 of this report, whether compliant or non-compliant, is provided to identify the legal obligations of the Site and provide guidance on actions necessary to obtain and maintain compliance. Please note that the questions posed in the checklist are sometimes broad and therefore a number of obligations/compliance activities could be applied to the questions. In order to obtain full compliance and improve your EHS management, it is recommended that the Site implement actions to address all the non-compliant findings, recommendations as well as observations.

9. COPYRIGHT AND CONFIDENTIALITY

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Version	Date	Compiled by:	
0	15/11/2022	 _____ Elana Keef <i>Auditor: Environmental</i>	 _____ Hanlie Hattingh <i>Auditor: Health & Safety</i>

Annexure A: List of legislation applicable to this audit

A.1 Environmental Legislation

LEGISLATION	TIER	ABBREVIATION
Animal Health Act, 7 of 2002	National	AHA
Animal Protection Act , 71 of 1962	National	AnPA
Conservation of Agricultural Resources Act, 43 of 1983	National	CARA
Conservation of Agricultural Resources Act, 43 of 1983 - Weed Control Scheme-Establishment (GN R1044, GG 9238 of 20 August 2004)	National	CARA Weed Regs
Conservation Of Agricultural Resources Act, 43 of 1983 - Soil Conservation Scheme-Establishment (GNR 1047)	National	CARA Soil Regs
Conservation of Agricultural Resources Act, 43 of 1983 - of Agricultural Resources Regulations (GN R1048, GG 9238 of 25 May 1984)	National	CARA Regs
Constitution of the Republic of South Africa, 1996	National	Const.
Disaster Management Act 57 Of 2002	National	DMA
Environment Conservation Act, 73 of 1989	National	ECA
Environment Conservation Act, 73 of 1989 - Regulations Regarding Waste Disposal Sites	National	ECA Waste Disposal Sites Regs
Environment Conservation Act, 73 of 1989 - Noise Control Regulations In Terms Of Section 25 (GN R154)	Provincial	ECA Noise Control Regs
Fencing Act, 31 of 1963	National	FA
Fertilisers Farm Feed, Agricultural Remedies and Stock Remedies Act, 36 of 1947	National	FFFARSRA
Fertilisers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 36 of 1947 - GN R1449 - Regulations Relating to the Registration of Fertilisers, Farm Feeds, Agricultural Remedies, Stock Remedies, Sterilising Plants and Pest Control Operators, Appeals and Imports and Amendments to and Repeal of Certain Regulations	National	FFFARSRA Regs
Fertilisers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 36 of 1947 - GN R98 - Pest Control Operator Regulations	National	PCO Regs
Fire Brigade Service Act, 99 of 1987	National	FBSA
Standard By-laws Relating to Fire Brigade Services (AN 1687)	National	Standard By-laws Relating to Fire Brigade Services
Hazardous Substances Act, 15 of 1973	National	HSA
Hazardous Substances Act, 15 of 1973 - Declaration of Group II Hazardous Substances (GNR 1382)	National	HSA Group II Declaration
Hazardous Substances Act, 15 of 1973 – Declaration of Group III Hazardous Substances (GN R1302, GG 13299, 14 June 1991)	National	HSA Group III Declaration

Hazardous Substances Act, 15 of 1973 – Regulations Relating to Group III Hazardous Substances (GN R690, GG 11823, 14 April 1989)	National	HSA Group III Regulations
Legal Metrology Act 9 of 2014	National	LMA
Mineral and Petroleum Resources Development Act, 28 of 2002		
Mineral and Petroleum Resources Development Act, 28 of 2002 - Mineral and Petroleum Resources Development Regulations (GN R527 of 2004)		
Mineral and Petroleum Resources Development Act, 2002 (Act, 28 of 2002) - Division of the Republic into Regions		
Mineral and Petroleum Resources Development Act, 2002 (Act, 28 of 2002) - Designation of the Petroleum Agency South Africa (Proprietary) Limited		
Mineral and Petroleum Resources Development Act, 2002 (Act, 28 of 2002) - Exemption of Organs of State from Certain Provisions		
National Building Regulations and Building Standards Act, 103 of 1977		NBRBSA
National Building Regulations and Building Standards Act, 103 of 1977 - Regulations Under Section 17 (1)	National	NBRBSA Regs
National Environmental Management Act, 107 of 1998	National	NEMA
National Environmental Management Act 107 of 1998: Regulations to prohibit the production, distribution, import, export, sale and use of Persistent Organic Pollutants that are listed by the Stockholm Convention on Persistent Organic Pollutants	National	NEMA Persistent Organic Pollutants
National Environmental Management Act, 107 of 1998 - Environmental Impact Assessment Regulations, 2014 (GN R982, GG 38282 of 4 December 2014) read with Environmental Impact Assessment Regulations Listing Notice 1 of 2014 (GN R983, GG 38282 of 4 December 2014); Environmental Impact Assessment Regulations Listing Notice 2 of 2014 (GN R984, GG 38282 of 4 December 2014) and Environmental Impact Assessment Regulations Listing Notice 3 of 2014 (GN R985, GG 38282 of 4 December 2014)	National	EIA Regs 2014
National Environmental Management Act, 107 of 1998 - Regulations to Phase-out the Use of Polychlorinated Biphenyls (PCBs) Materials and Polychlorinated Biphenyl (PCBs) Contaminated Materials	National	PCB Regs
National Environmental Management Act, 107 of 1998 - Regulations for the Establishment of a Designated National Authority for the Clean Development Mechanism	National	CDM Regs
National Environmental Management Act, 107 of 1998 - Environmental Management Framework Regulations, 2010	National	EMF Regs
National Environmental Management Act, 107 of 1998 - Regulations Relating to Identification of environmental Management Inspectors	National	Environmental Management Inspector Regs
National Environmental Management Act, 107 of 1998 - National Appeal Regulations, 2014	National	National Appeal Regulations

National Environmental Management Act, 107 of 1998 - National Exemption Regulations, 2014	National	National Exemption Regs
National Environmental Management Act 107 of 1998 - Regulations Relating to the Procedure to be Followed when Oral Requests are made in terms of Section 30A	National	NEMA Section 30A Regs
National Environmental Management Act: Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of section 24G	National	NEMA Section 24G Regs
National Environmental Management Act, 107 of 1998: Section 24H Registration Authority Regulations	National	NEMA Section 24H Regs
Appointment of the Environmental Assessment Practitioners Association of South Africa as the single registration authority in terms of section 24H of the Act	National	EAP Registration Authority Appointment
National Environmental Management, 39 of 2004: National Greenhouse Gas Emission Reporting Regulations	National	GHG Emission Reporting Regs
National Greenhouse Gas Emission Reporting Regulations: Notice of procedure to be followed by Category A data providers for registration and reporting as a Category A data provider	National	GHG Emission Reporting Procedure
National Environmental Management: Waste Act, 59 of 2008	National	NEMWA
National Environmental Management: Waste Act 59 of 2008 - List of Waste Management Activities That Have, or are Likely to Have, a Detrimental Effect on the Environment (GN 921 of 2013)	National	NEM:WA List of Activities 2013
National Environmental Management Waste Act, 59 of 2008 - Regulations Regarding the Planning and Management of Residue stockpiles and Residue Deposits, 2015	National	Residue Stockpile Regs
National Environmental Management: Waste Act 59 of 2008 - National Norms and Standards for the Storage of Waste (GN 926)	National	Norms and Standards for the Storage of Waste
National Environmental Management: Waste Act, 59 of 2008 - National Norms and Standards for the Assessment of Waste for Landfill Disposal (GNR 635)	National	Norms and Standards for the Assessment of Waste for Landfill Disposal
National Environmental Management : Waste Act 59 of 2008 - National Norms and Standards for Disposal of Waste to Landfill (GN R636)	National	Norms and Standards for Disposal of Waste to Landfill
National Environmental Management: Waste Act, 59 of 2008: National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening or Bailing of General Waste	National	Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening or Bailing of General Waste
National Environmental Management: Waste Act, 59 of 2008 - Waste Classification and Management Regulations, 2013 (GN R634)	National	WCM Regs
National Environmental Management: Waste Act, 59 of 2008 - National Waste Information Regulations (GN 625, GG 35583 of 13 August 2012)	National	NWI Regs
National Environmental Management: Waste Act, 59 of 2008 - Waste Exclusion Regulations, 2018	National	WER

National Forests Act, 84 of 1998	National	NFA
National Heritage Resources Act, 25 of 1999	National	NHRA
National Heritage Resources Act, 25 of 1999 - Regulations in terms of section 25	National	NHRA
National Heritage Resources Act, 25 of 1999 - Regulations in terms of section 25	National	NHRA Regs
National Nuclear Regulator Act, 47 of 1999	National	NNRA
National Nuclear Regulator Act 47 of 1999: Regulation in terms of Section 47, Read with Section 26(4) of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), on the Establishment of a Public Safety Information Forum by the Holder of a Nuclear Installation Licence	National	NNRA Public Safety Information Forum
National Nuclear Regulator Act 47 of 1999: Regulations in terms of section 47, Read with Section 26(4) of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), on the Establishment of a Public Safety Information Forum by the Holder of a Nuclear Installation Licence to Inform the Person Living in the Municipality Area in Respect of which an Emergency Plan has been Established	National	NNRA Section 47 Regs
National Nuclear Regulator Act 47 of 1999: Regulation in terms of Section 36, Read with Section 47 of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), on Safety Standards and Regulatory Practices	National	NNRA Section 36 Regs
National Nuclear Regulator Act 47 of 1999: Regulation on Licensing of Sites for New Nuclear Installations, 2010	National	NNRA Licensing of New Nuclear Installations Regs
National Radioactive Waste Disposal Institute Act, 53 of 2008	National	NRWDIA
National Road Traffic Act, 93 of 1996	National	NRTA
National Road Traffic Act, 93 of 1996 - National Road Traffic Regulations, 2000	National	NRTA Regs
National Veld And Forest Fire Act, 101 of 1998	National	NVFFA
National Water Act, 36 of 1998	National	NWA
National Water Act, 36 of 1998 - General Authorisations in terms of Section 39 of the National Water Act, 36 of 1998 (GN 398/2004)	National	NWA General Authorisation
National Water Act, 36 of 1998 - Regulations Requiring That A Water Use Be Registered	National	NWA Water Use Registration Regs
National Water Act 36 of 1998: Revision of General Authorisation For The Taking And Storing of Water (GN 538 of 2016)	National	NWA General Authorisation for the Taking and Storing of Water
National Water Act, 36 of 1998: New nine (9) water management areas of South Africa	National	NWA Nine water management areas
National Water Act, 36 of 1998- General Authorisation in terms of section 39 of the NWA for water uses as defined in section 21(c) or section 21(i)	National	NWA General Authorisation in terms of section 39
Water Act, 54 of 1956 - Regulations In Terms Of Section 26 Read In Conjunction With Section 12A Of The Water Act, 1956	National	NWA Section 26 Regs

(Act 54 Of 1954), For The Erection, Enlargement, Operation And Registration Of Water Care Works - GN R2834		
National Water Act, 36 of 1998 (GN 704) - Regulations on use of Water for Mining and Related Activities Aimed at the Protection of Water Resources	National	Water for Mining and Related Activities Regs
National Water Act, 36 of 1998 - Regulations Regarding the Safety of Dams in terms of Section 123(1) of the National Water Act, 1998	National	Dam Safety Regs
Occupational Health and Safety Act, 85 of 1993	National	OHSA
Occupational Health and Safety Act 85 of 1993: Regulations for Hazardous Chemical Agents, 2021	National	HCSR
Occupational Health and Safety Act, 85 of 1993 - GN R1031 - General Safety Regulations, 1986	National	GSR
Occupational Health and Safety Act, 85 of 1993 - Environmental Regulations for Workplaces, 1987	National	ERW
Occupational Health and Safety Act, 85 of 1993 - Facilities Regulations, 2004	National	FR
Occupational Health and Safety Act, 85 of 1993 - Regulations for Hazardous Biological Agents	National	HBAR
Occupational Health and Safety Act, 85 of 1993 - Noise-induced Hearing Loss Regulations	National	NIHL
Water Services Act, 108 of 1997	National	WSA
Water Services Act, 108 of 1997 - Regulations Relating to Compulsory National Standards and Measures to Conserve Water	National	WSA Regs
Kwazulu-Natal Heritage Act 4 of 2008	Provincial	KZNHA
Natal Nature Conservation Ordinance, 15 of 1974	Provincial	NNCO
Natal Prevention Of Environmental Pollution Ordinance, 21 of 1981	Provincial	NPEPO
Natal Prevention Of Environmental Pollution Ordinance, 21 of 1981 - Prevention Of Environmental Pollution Regulations	Provincial	PEPR
Water Services Ordinance 27 of 1963 (KwaZulu - Natal)	Provincial	KZN Water Services Ordinance
King Cetshwayo District Municipality (uThungulu District Municipality): Regional Solid Waste Disposal Sites By-laws	District	KCDM Solid Waste Disposal Sites BL
King Cetshwayo District Municipality (uThungulu District Municipality): Water Services By-laws, 2014	District	KCDM Water Services BL
Umlalazi Local Municipality: Beaches By-laws	Local	ULM Beaches BL
Umlalazi Local Municipality: Disaster Management and Fire Prevention By-laws, 2020	Local	ULM Fire Prevention BL
Umlalazi Local Municipality: Encroachment By-laws	Local	ULM Encroachment BL
Umlalazi Local Municipality: Health By-laws	Local	ULM Health BL

Umlalazi Local Municipality: Nuisances By-laws	Local	ULM Nuisances BL
Umlalazi Local Municipality: Refuse By-laws	Local	ULM Refuse BL
Umlalazi Local Municipality: Roads By-laws	Local	ULM Roads BL
Umlalazi Local Municipality: Stormwater Management By-laws	Local	ULM Stormwater Management BL

A.2 Occupational Health & Safety Legislation

LEGISLATION	TIER	ABBREVIATION
Basic Conditions of Employment Act, 75 of 1997	National	BCEA
Basic Conditions of Employment Act, 75 of 1997 - Regulations in Terms of Section 87 (1) (a) Code of Good Practice on the Arrangement of Working Time	National	BCEA Code of Good Practice on the Arrangement of Working Time
Basic Conditions of Employment Act, 75 of 1997 - Regulations in Terms of Section 87 (1) (b) Code of Good Practice on the Protection of Employees during Pregnancy and After the Birth of a Child	National	BCEA Code of good practice on the protection of employees during pregnancy and after the birth of a child
Basic Conditions Of Employment Act, 75 Of 1997 - GN 7 - Regulations On Hazardous Work By Children In South Africa	National	BCEA Hazardous Work by Children
Basic Conditions Of Employment Act 75 Of 1997 - Regulations In Terms Of Section 86(1)	National	BCEA Regs in terms of section 86(1)
Compensation for Occupational Injuries and Diseases Act, 130 of 1993	National	COIDA
Compensation for Occupational Injuries and Diseases Act, 130 of 1993 - Rules, Forms and Particulars which shall be Furnished in Terms of the Compensation for Occupational Injuries and Diseases Act, 1993 (Act no. 130 of 1993) (GN 983)	National	COIDA Rules, Forms & Particulars
Compensation for Occupational Injuries and Diseases Act, 130 of 1993 - Regulations under the Compensation for Occupational Injuries and Diseases Act, (Act no. 130 of 1993) as Amended (GN 16)	National	COIDA Regs
Regulation on IOD/OD documents to be provided by employers to Compensation Fund in administration of claims adjudication processes	National	COIDA: IOD/OD documents Regs
Constitution of the Republic of South Africa, 1996	National	Const.
Disaster Management Act 57 of 2002	National	DMA
Employment Equity Act, 55 of 1998	National	EEA
Employment Equity Act, 55 of 1998: Code of Good Practice on Employment of Persons With Disabilities	National	Code of Good Practice on Employment of Persons with Disabilities
Employment Equity Act, 55 of 1998: Code of Good Practice on HIV and AIDS and the World of Work	National	Code of Good Practice on HIV and AIDS
Fertilisers Farm Feed, Agricultural Remedies and Stock Remedies Act, 36 of 1947	National	FFFARSRA
Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 36 of 1947 - GN R732 - Regulations Regarding Fertilizers	National	FFFARSRA Regs
Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 36 of 1947 - GN R384 - Prohibition on the Acquisition, Disposal, Sale and Use of Certain Agricultural Remedies and Stock Remedies	National	PCO Regs

Fire Brigade Service Act, 99 of 1987	National	FBSA
Standard By-laws Relating to Fire Brigade Services (AN 1687)	National	Standard Bylaws Relating to Fire Brigade Services
Foodstuffs, Cosmetics and Disinfectants Act, 54 of 1972	National	FCDA
Regulations Governing General Hygiene Requirements for Food premises and the Transport of Food (GN R638, GG 41730 of 22 June 2018)	National	FCDA General Hygiene Regs
Hazardous Substances Act, 15 of 1973	National	HSA
Hazardous Substances Act, 15 of 1973 - Regulations under the Hazardous Substances Act, 1973 (Act 15 of 1973) (GNR 453)	National	HSA Regs
Hazardous Substances Act, 15 of 1973 - Declaration of Group II Hazardous Substances (GNR 1382)	National	HSA Group II Declaration
Hazardous Substances Act, 15 of 1973 – Declaration of Group III Hazardous Substances (GN R1302, GG 13299, 14 June 1991)	National	HSA Group III Declaration
Hazardous Substances Act, 15 of 1973 – Regulations Relating to Group III Hazardous Substances (GN R690, GG 11823, 14 April 1989)	National	HSA Group III Regulations
Health Professions Act, 56 of 1974	National	HPA
Health Professions Act, 56 of 1974 - GN R1730 - Regulations relating to the Dispensing of Medicines by Medical Practitioners and Dentists	National	HPA Regs
Health Professions Act, 56 of 1974 - BN 29 - Rules Relating to Continuing Education and Training for Registered Health Practitioners	National	HPA Rules
Health Professions Act, 56 of 1974 - GN R1883 - Regulations Relating to the Returns and Information to be Furnished by Registered Persons	National	HPA Regs: Returns and Information by Registered Persons
Health Professions Act, 56 of 1974 - GN R717 - Ethical Rules Of Conduct For Practitioners Registered Under The Act, 1974	National	HPA Ethical Rules of Conduct for Registered Practitioners
Health Professions Act, 56 of 1974: Regulations Defining the Scope of Practice of Clinical Associates	National	HPA Regs defining the scope of practice of clinical associates
Health Professions Act, 56 of 1974: Regulations Relating to the Registration of Health Practitioners Restricted to Non-Clinical Practice	National	HPA Registration of Non-Clinical Health Practitioners Regs
Labour Relations Act, 66 of 1995	National	LRA
Labour Relations Act, 66 of 1995 - of Good Practice: Key Aspects of HIV/AIDS and Employment	National	LRA: Code of Good Practice on HIV/AIDS
Labour Relations Act, 66 of 1995: Code of Practice: Managing exposure to SARS-COV-2 in the Workplace, 2022	National	Code of Practice: Managing SARS-COV-2 in the Workplace
Legal Metrology Act 9 of 2014	National	LMA
Mine Health and Safety Act, 29 of 1996	National	MHSA

Mine Health and Safety Act, 29 of 1996 - GN R93 - Mine Health and Safety Regulations	National	MHSA Regs
Mines And Works Act 27 of 1956	National	MWA
National Building Regulations and Building Standards Act, 103 of 1977	National	NBRBSA
National Building Regulations and Building Standards Act, 103 of 1977 - Regulations Under Section 17(1) (GN R2378, GG 12780, 12 October 1990)	National	NBRBSA Regs
National Health Act, 61 of 2003	National	NHA
National Health Act, 61 of 2003 - National Environmental Health Norms and Standards For Premises and Acceptable Monitoring Standards For Environmental Health Practitioners	National	Norms and Standards For Premises and Acceptable Monitoring Standards For Environmental Health Practitioners
Norms and Standards Regulations Applicable to Different Categories of Health Establishments, 2017	National	Norms and Standards Regulations Applicable to Different Categories of Health Establishments
National Health Act, 61 of 2003 - Regulations relating to the surveillance and the control of notifiable medical conditions (GN1434)	National	NHA Regs relating to notifiable medical conditions
National Nuclear Regulator Act, 47 of 1999	National	NNRA
National Nuclear Regulator Act 47 of 1999: Regulation in terms of Section 47, Read with Section 26(4) of the National Nuclear Regulator Act,1999 (Act co. 47 of 1999), on the Establishment of a Public Safety Information Forum by the Holder of a Nuclear Installation Licence	National	NNRA Public Safety Information Forum
National Nuclear Regulator Act 47 of 1999: Regulations in terms of section 47, Read with Section 26(4) of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), on the Establishment of a Public Safety Information Forum by the Holder of a Nuclear Installation Licence to Inform the Person Living in the Municipality Area in Respect of which an Emergency Plan has been Established	National	NNRA Section 47 Regs
National Nuclear Regulator Act 47 of 1999: Regulation in terms of Section 36, Read with Section 47 of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), on Safety Standards and Regulatory Practices	National	NNRA Section 36 Regs
National Nuclear Regulator Act 47 of 1999: Regulation on Licensing of Sites for New Nuclear Installations, 2010	National	NNRA Licensing of New Nuclear Installations Regs
National Road Traffic Act, 93 of 1996	National	NRTA
National Road Traffic Act, 93 of 1996 - National Road Traffic Regulations, 2000	National	NRTA Regs
Nursing Act, 33 of 2005	National	NA
Nursing Act, 33 of 2005 - Regulations relating to the Scope of Practice of Persons who are Registered or Enrolled under the Nursing Act, 1978	National	NA Regs: Scope of Practice of Registered Persons
Regulations Regarding Fees and Fines Payable to the South	National	Nursing Council Regs

African Nursing Council, 2013		
Occupational Health and Safety Act, 85 of 1993	National	OHSA
Occupational Health and Safety Act 85 of 1993: Regulations for Hazardous Chemical Agents, 2021	National	HCSR
Occupational Health and Safety Act, 85 of 1993 - GN R1031 - General Safety Regulations, 1986	National	GSR
Occupational Health and Safety Act, 85 of 1993 - Environmental Regulations for Workplaces, 1987	National	ERW
Occupational Health and Safety Act, 85 of 1993 - General Machinery Regulations, 1988	National	GMR
Occupational Health and Safety Act, 1993 - Driven Machinery Regulations, 2015	National	DMR
Occupational Health and Safety Act, 85 of 1993 - Electrical Machinery Regulations, 2011	National	EMR
Occupational Health and Safety Act, 85 of 1993 - Facilities Regulations, 2004	National	FR
Occupational Health and Safety Act, 85 of 1993 - Lead Regulations, 2001	National	LR
Occupational Health and Safety Act, 85 of 1993 - Electrical Installation Regulations, 2009	National	EIR
Occupational Health and Safety Act, 85 of 1993 - General Administrative Regulations, 2003 (GN R929)	National	GAR
Occupational Health and Safety Act, 85 of 1993 - Regulations for Hazardous Biological Agents	National	HBAR
Occupational Health and Safety Act, 85 of 1993 - Noise-induced Hearing Loss Regulations	National	NIHL
Occupational Health and Safety Act, 85 of 1993 - GN R84 - Construction Regulations, 2014	National	CR
Occupational Health and Safety Act, 85 of 1993 - Pressure Equipment Regulations, 2009 (GN R734)	National	PER
Occupational Health and Safety Act, 85 of 1993 - Major Hazard Installation Regulations	National	MHI Regs
Occupational Health and Safety Act 85 of 1993: Asbestos Abatement Regulations, 2020	National	AAR
Occupational Health and Safety Act 85 of 1993: Ergonomics Regulations, 2018	National	ER
Occupational Health and Safety Act, 85 of 1993 - Regulations concerning the Certificate of Competency	National	COC Regs

Occupational Health and Safety Act, 85 of 1993 - Direction in terms of Section 7(1) of the Occupational Health and Safety Act, 85 of 1993 (GN R859 of 2005)	National	OHSA: Direction in terms of Section 7(1)
Occupational Health and Safety Act, 1993 - Notice of Inclusion in terms of Section 43 (1) (b) (xii) of The Occupational Health and Safety Act, 1993 (AIA SANAS Accreditation)	National	AIA SANAS Accreditation Notice
Occupational Health and Safety Act, 85 of 1993 - Notice of Directive in terms of Section 7 (1) of The Occupational Health and Safety Act, 1993 (COIDA Class XXI Health and Safety Written Policy)	National	COIDA Class XXI Health and Safety Written Policy Directive
Occupational Health and Safety Act: Amended notice of direction in terms of section 27(2) of the Occupational Health and Safety Act, read with Regulation 3(4)(a) of the General Safety Regulations	National	GAR Directive Regulation 3(4)(a) Directive
Occupational Health and Safety Act 85 of 1993: Exemption from Ergonomics Regulations	National	ER Exemption
Private Security Industry Regulation Act 56 of 2001	National	PSIRA
Private Security Industry Regulation Act 56 Of 2001: Code Of Conduct For Security Service Providers, 2003	National	PSIRA Code of Conduct
Protection of Personal Information Act 4 Of 2013	National	PPIA
Protection of Personal Information Act, 4 of 2013: Regulations relating to the protection of personal information, 2018	National	PPIA Regs
Security Officers Act, 92 of 1987	National	SOA
South African Maritime Safety Authority Act, 5 of 1998	National	SAMSAA
Tobacco Products Control Act, 83 of 1993	National	TPCA
Tobacco Products Control Act, 83 of 1993 - Notice relating to Smoking of Tobacco Products in Public Places	National	TPC Regs
Umlalazi Local Municipality: Disaster Management and Fire Prevention By-laws, 2020	Local	ULM Fire Prevention BL

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