



Implats – Impala Rustenburg operations

2026 South African Mining Industry Survey

Effectiveness of Entry Examination & Making Safe (EEMS) and Trigger Action Response Plans (TARP)

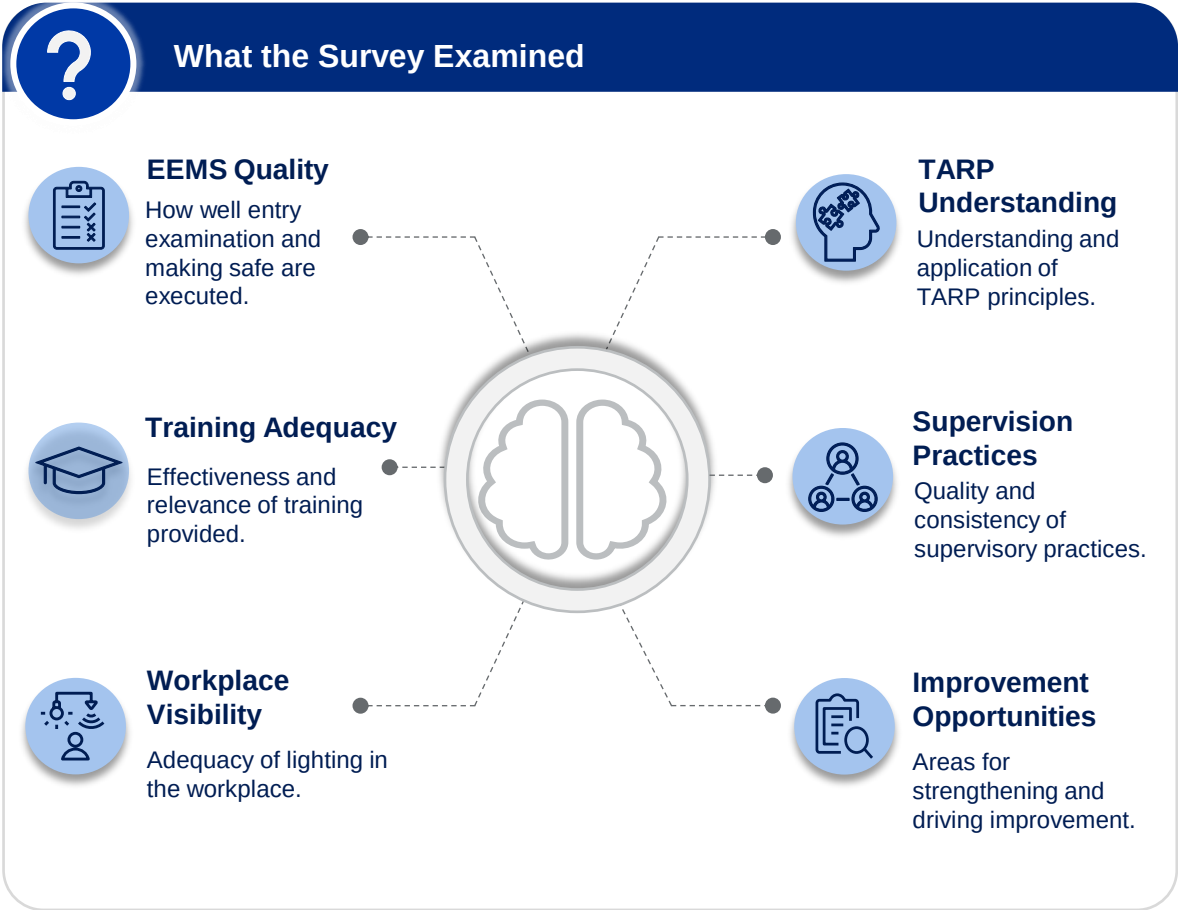
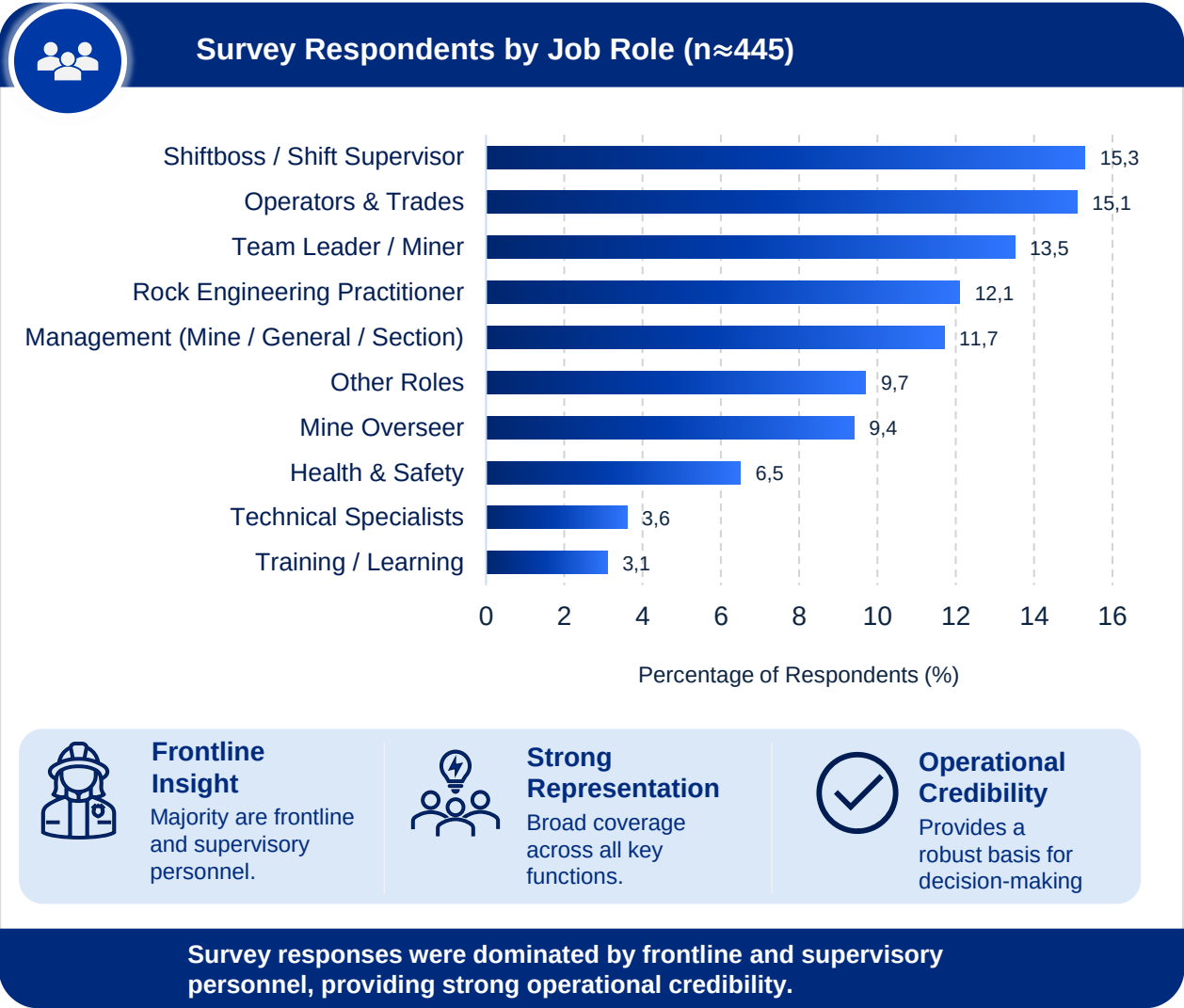
From Compliance to Control Effectiveness

Prepared by MOSH FoG Team for Industry Day of Learning held on 24 July 2026 at Silverstar Casino



Operational Credibility

Who responded and what the survey examined



Understanding the Findings Through a Learning Lens

The survey findings highlight opportunities to strengthen critical controls, **not opportunities to assign blame.**



✓ WHAT THE SURVEY FOUND



Conditions affecting execution



Opportunities for improvement



Areas requiring stronger controls

✗ WHAT THE SURVEY DID NOT FIND



Deliberate disregard for safety



Evidence of non-compliance



A single stakeholder to blame

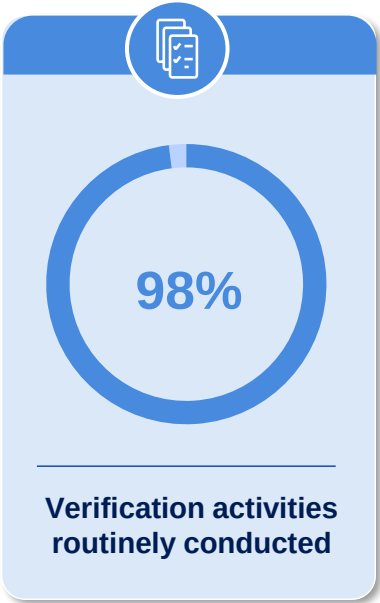
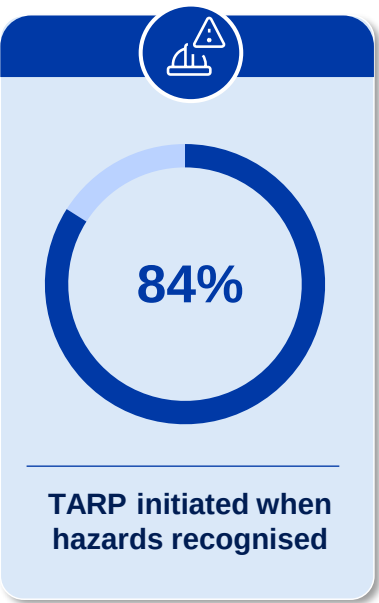
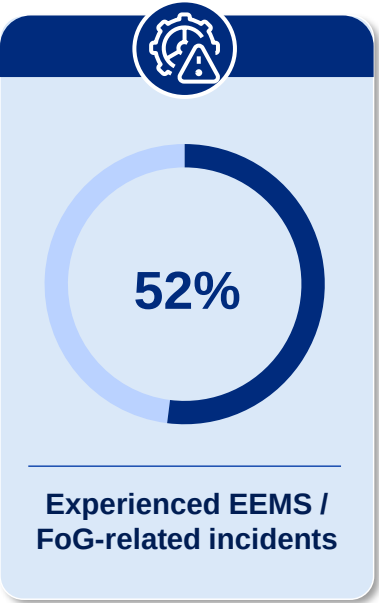
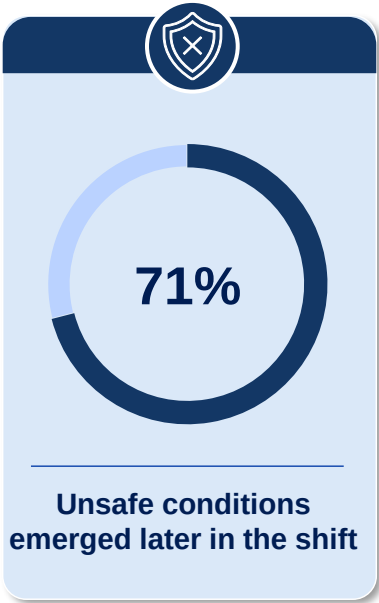


Every mining operation manages competing demands. The purpose of this survey was to understand **how real operating conditions influence the effectiveness of EEMS and TARP controls in practice.**

Executive Summary

The Survey Revealed Four Critical Insights

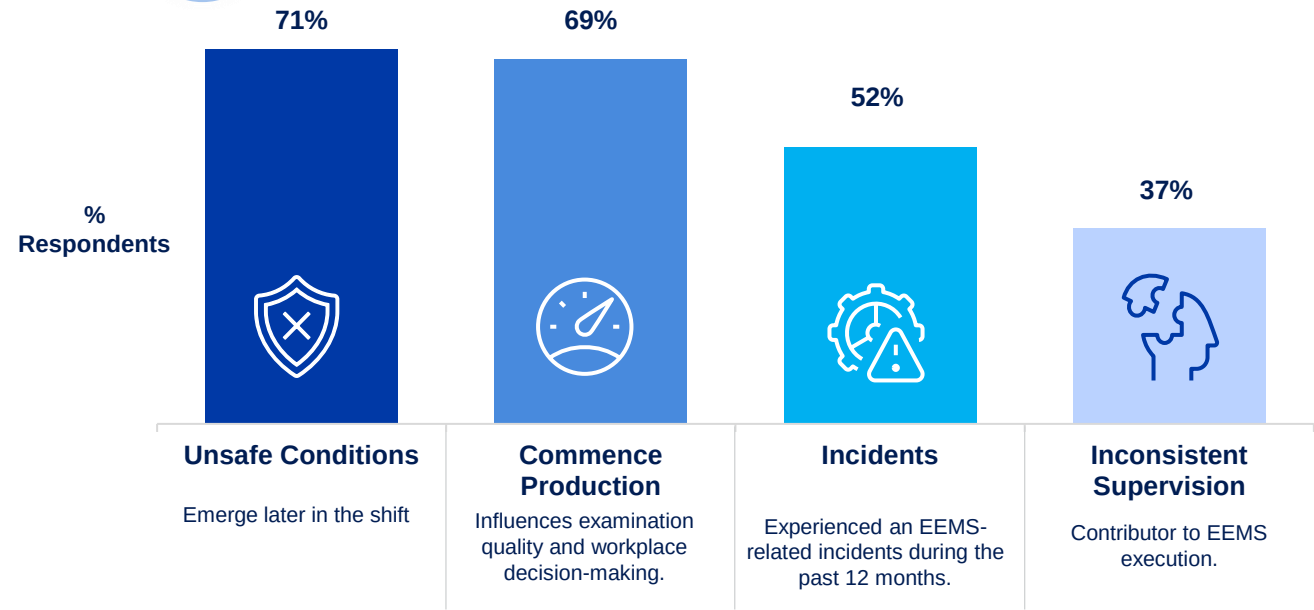
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Respondents



Controls exist. Execution is failing at the workplace.

Entry Examination and Making Safe

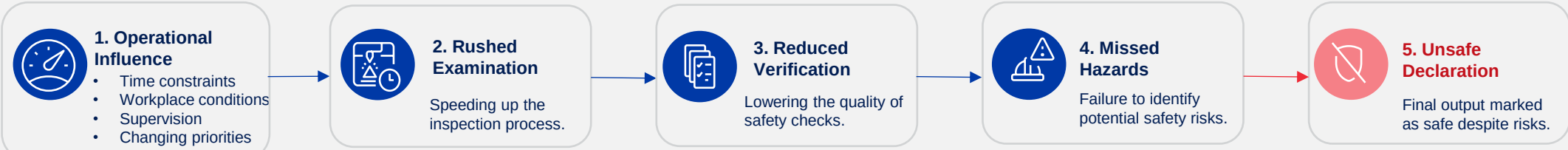
Key Survey Findings Related to EEMS Effectiveness



Key Insight

- EEMS effectiveness may become vulnerable when examination time, workplace conditions, supervision quality and operational demands **intersect**.
- Although training is generally provided, control effectiveness appears to depend on the quality of execution, verification and workplace conditions **rather than procedure compliance alone**.

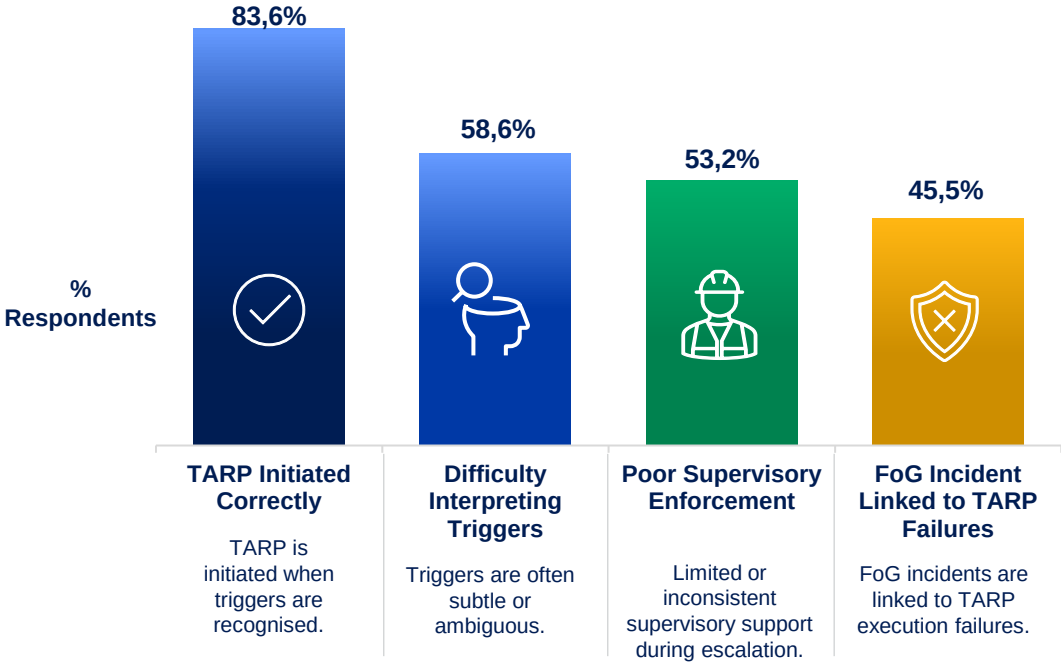
Conditions that Influence EEMS Effectiveness: How unsafe conditions emerge



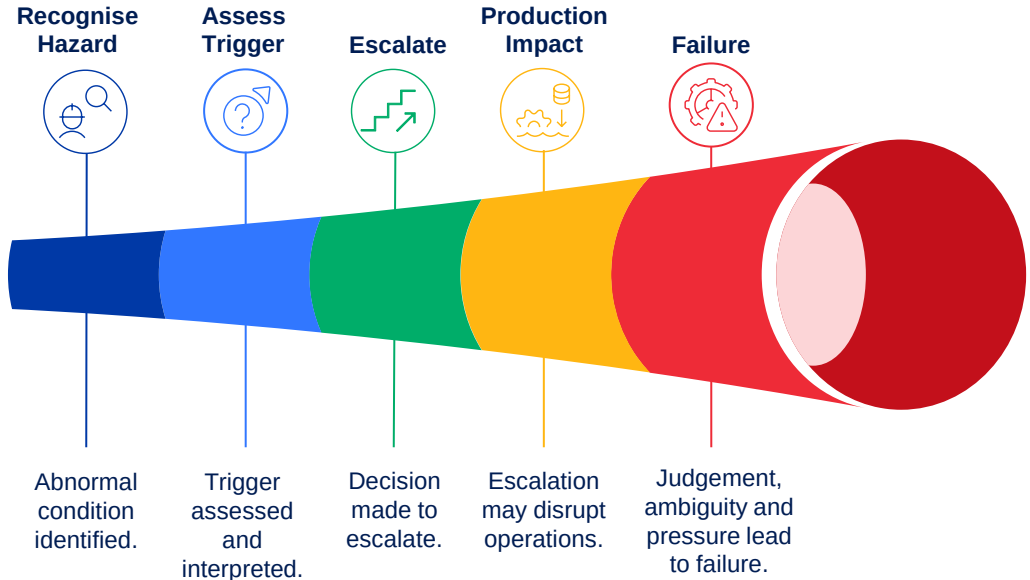
Key Survey Findings Related to TARP Effectiveness



TARP Initiation is Strong, Execution is Weak



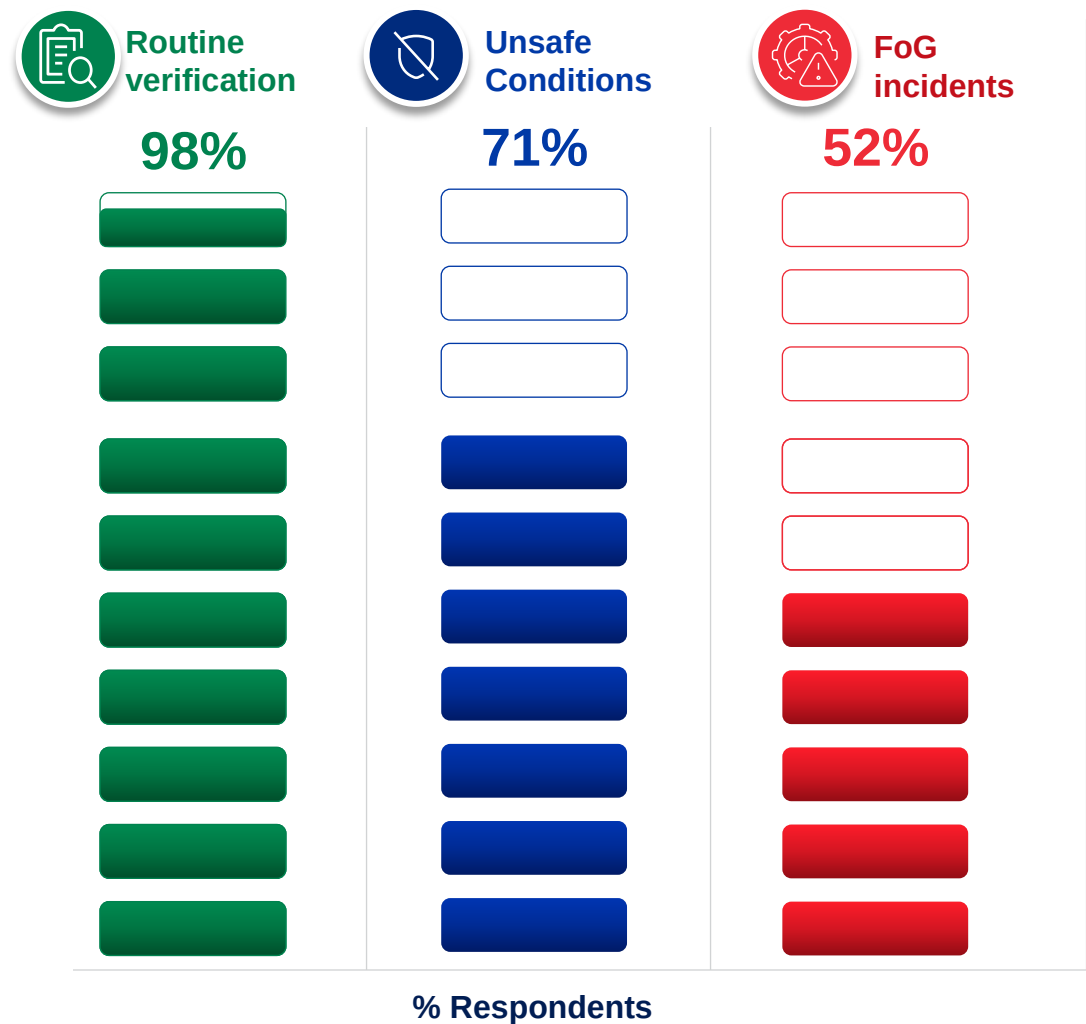
TARP Vulnerability Pathway



The opportunity is not only to remind people to apply TARP, but to make triggers clearer, strengthen supervisory support, and create an environment where escalation is supported before failure occurs.

Verification Integrity Gap

Large gap between routine verification and verification of unsafe conditions and FoG incidents

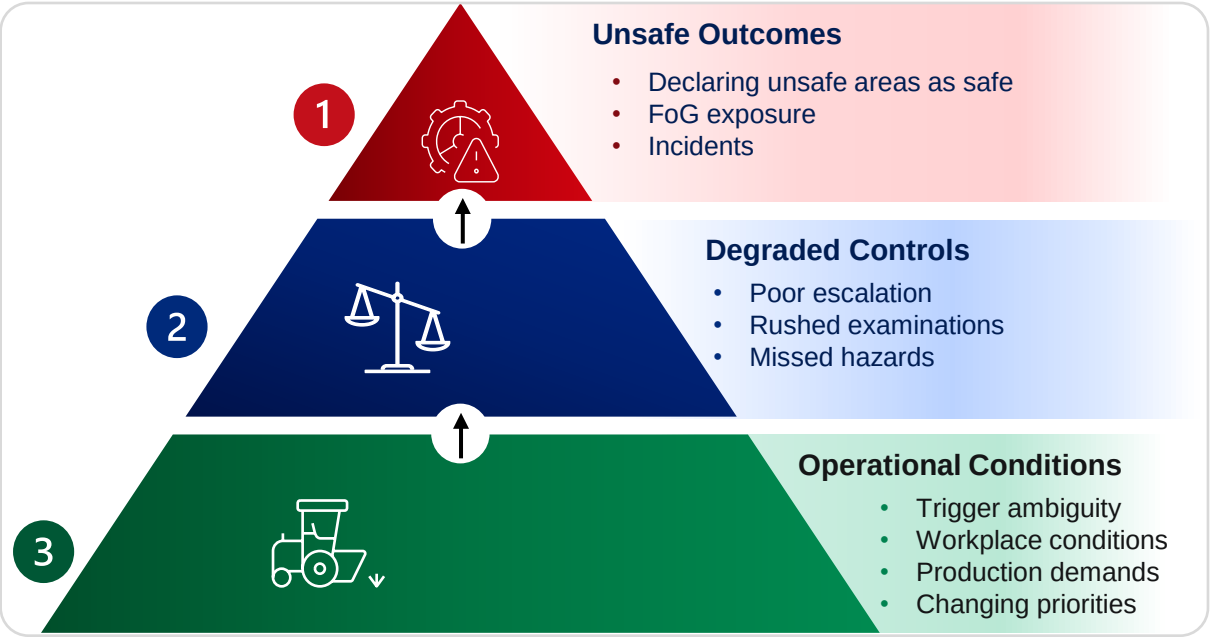


The industry verifies completion of process, not effectiveness of controls.

The opportunity for the industry is therefore to **strengthen verification quality** — moving beyond paperwork and completion checks, toward **confirming** that **hazards** were identified, **controls** were applied, and the workplace was **genuinely made safe** before exposure occurs.

Operational Conditions Influencing Control Effectiveness

The survey indicates that EEMS and TARP effectiveness can be affected when operational demands, workplace conditions, supervision quality and escalation decisions intersect.



Supporting Statistics		
	69%	Pressure to commence production
	57%	Complacency and normalisation
	39%	Lack of accountability
	37%	Inconsistent supervision



Key
Insight

The challenge is not simply compliance with procedures but ensuring that critical controls remain effective under real operating conditions.

Industry Priorities

Key focus areas to strengthen examination quality and TARP escalation effectiveness.



Strengthening EEMS

Leadership

Visibility

Verification



Supervisory presence



Physical examination quality



Lighting and visibility



On-the-job training



Accountability & inclusion of personnel



Strengthening TARP

Identification

Escalation

Consistency



Clear trigger definitions



Visibility of triggers



Scenario-based training



Consistent application



Strengthen execution under operational conditions.



Strengthening supervision, visibility, accountability and escalation discipline will have the greatest impact on control effectiveness.



Key Industry Message





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