

1 October 2025

DFFE Reference: 14/12/16/3/3/1/2837 (JAM1)

**Department of Environment, Forestry and Fisheries
Environment House
473 Steve Biko
Arcadia, Pretoria 0001**

Attention: Director: Compliance Monitoring
By email: directorcompliance@environment.gov.za

Copied to:

ECO and Client Representative: **Mr Jeremy Rose:** jeremy@infinityenv.co.za
ECO: **Mr Tom Smyth:** tom@infinityenv.co.za

Dear Sir/Madam,

SUBMISSION OF THE FIRST NEMA EIA REG 34 EXTERNAL AUDIT REPORT – IMPLEMENTATION PHASE, SEPTEMBER 2025 - FOR THE DREDGING OF THE ZEEKOEVLEI WITHIN THE FALSE BAY NATURE RESERVE, CITY OF CAPE TOWN, WESTERN CAPE

Herewith enclosed please find the first external audit report, as required by conditions 27 and 28 of the Environmental Authorisation (Ref. 14/12/16/3/3/1/2837), issued on 16 April 2024 for this project.

Please kindly acknowledge receipt of this report and do not hesitate to contact me with any queries pertaining to its contents.

Yours sincerely,



Christine Rabie

B.Tech Environmental Management
Pr. Sci. Nat. 400055/17

Environmental Management Audit - NEMA EIA Reg 34 Audit – September 2025

Dredging of the Zeekoevlei within the False Bay Nature Reserve City of Cape Town, Western Cape

DFFE Reference: 14/12/16/3/3/1/2837 (/AM1)

FINAL REPORT

30 SEPTEMBER 2025

**Prepared by:
Christine Rabie**

**Prepared for:
The City of Cape Town: Biodiversity Management Branch**

Executive Summary

This report presents the findings of the external environmental audit for the Zeekoevlei dredging project, undertaken in terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), and as required by the project's Environmental Authorisation (EA: Ref. 14/12/16/3/3/1/2837, issued 16 April 2024 and amended 25 April 2025). The audit was conducted on **11 September 2025** and assessed compliance with the EA conditions and the Environmental Management Programme (EMPr, January 2024). The audit covered both conditions observed at the time of site inspection and evidence contained in Environmental Control Officer (ECO) reports and other supporting documentation for the audit period (March–August 2025).

Key Findings

- One non-compliance with the EA was recorded, relating to the requirement for pre-emptive reed-clearing, solid waste removal, and shoreline dredging prior to dredging commencement. The same issue constitutes a non-compliance with the EMPr (Outcome 4.3), as the originally specified timing could not be met. While this outcome remains technically non-compliant, the intended environmental benefit can still be achieved if the specified works are undertaken and verified at a later stage.
- Five EMPr outcomes/objectives were assessed as partially compliant due to recurring issues during the audit period with:
 - hydrocarbon storage and spill management,
 - waste separation and record-keeping,
 - environmental administration and management, including EO presence on site, completion of checklists and records, timely submission of method statements, and updating and maintaining the complaints register.
- At the time of the audit inspection, these issues had been largely rectified; however, their recurrence over several months indicates initial systemic weaknesses in the Contractor's environmental management systems and oversight. The Contractor's effort in addressing the outstanding requirements is acknowledged.
- No significant or lasting environmental harm was recorded during the audit period, but the identified lapses created residual risk of impact and liability.
- The ECO's oversight and reporting have been of a high standard and are commended for materially supporting environmental compliance on this project.

Recommendations

- The Contractor is to strengthen the EO role and associated administration through improved oversight and support, including any beneficial training and resourcing.
- The EA Holder is to undertake the required reed-clearing, solid waste removal, and shoreline dredging, and pursue an EMPr amendment to adjust the timing specification while retaining the intended environmental outcome.
- Finalise and approve the Peninsula Pipeline Route Method Statement and ensure no-go areas are demarcated before works proceed in that area.
- The Contractor is to ensure that bundled fuel storage and spill response capacity are consistently maintained and documented.
- Improve waste management systems, with particular emphasis on separation, recycling, and record-keeping, and,
- Maintain and update the complaints register promptly, ensuring that all incidents, including third-party impacts, are logged and closed out.

The next external audit report is due by **30 March 2026**.

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Abbreviations	
DFFE	Department of Forestry, Fisheries, and the Environment
EA	Environmental Authorisation (<i>Ref: 14/12/16/3/3/1/2837 issued on 16 April 2024 as amended on 25 April 2025</i>)
ECO	Environmental Control Officer
EO	Designated Environmental Officer (of the Contractor)
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme (<i>Environmental Management Programme: Proposed Dredging of the Zeekoevlei DFFE REF. 14/12/16/3/3/1/2837, Infinity Environmental, January 2024</i>)
FBNR	False Bay Nature Reserve
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act (No 107) of 1998
MS	(Environmental) Method Statement
MSDS	Material Safety Data Sheet

Designations and Definitions
Auditor: The external independent environmental auditor, Mrs Christine Rabie, who undertook this audit.
Audit period: The time period for which compliance with the Environmental Authorisation and EMPr is assessed. This extends from the commencement of project activities on site, or from the date of the previous Reg 34 audit (whichever is later), up to and including the date of the current audit. The audit period therefore covers the review of records of environmental performance during this timeframe, and is not limited to conditions observed on the day of the audit inspection.
Contractor (Principal): Guerrini Marine Construction (GMC)
Contractor's Construction Manager/Site Agent: Mr Nicanor Mboma
(Contractor's) Environmental Officer (DEO): Ms Bulelwa Nonjaca
EA Holder: City of Cape Town: Biodiversity Management Branch
Environmental Control Officer (ECO): Jeremy Rose and Tom Smythe from Infinity Environmental (Infinity)

Evidence: Written records or physical evidence or observations or oral statements given during interviews. Where possible oral statements are corroborated between more than one independent party.

Engineer/client representative: Responsible for overseeing the contractual implementation of the works on behalf of the EA Holder. Provided by PRDW for this project.

Site/Development: Project site located at the Zeekoevlei within the False Bay Nature Reserve, specifically the area that contains the activities authorised by the EA.

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions was appointed on behalf of the EA Holder, the City of Cape Town, to undertake an external environmental audit of this project's compliance with the conditions of the Environmental Authorisation (EA) Ref. 14/12/16/3/3/1/2837, as issued by the Department of Forestry, Fisheries, and the Environment (DFFE) on 16 April 2024 and amended on 25 April 2025, as well as the Environmental Management Programme (EMPr) for the project, dated January 2024. This is the first external audit undertaken for the project.

The project entails (per the EA) the following:

- Dredging of the Zeekoevlei, removing up to 750 000 cubic metres (m³) of organic sediments that have accumulated in the vlei as a result of long-term sewage contamination, inputs from polluted urban stormwater runoff, and agricultural drainage. The sediments are concentrated in two areas of the lake, namely Home Bay (in the western part of the vlei north of the Peninsula) and in Stormy Bay (making up the southern part of the vlei). The material is proposed to be dewatered and stored in the medium to long term in a disused maturation pond (Pond S3) at the Cape Flats Wastewater Treatment Works (CFWWTW). The dredged material will be pumped through a slurry pipeline to Pond S3, where excess water will be removed, and the material will be left to passively dry. The excess water will be pumped back to the CFWWTW for treatment prior to release into False Bay (Refer to the Site Plan in Figure 1 below.)

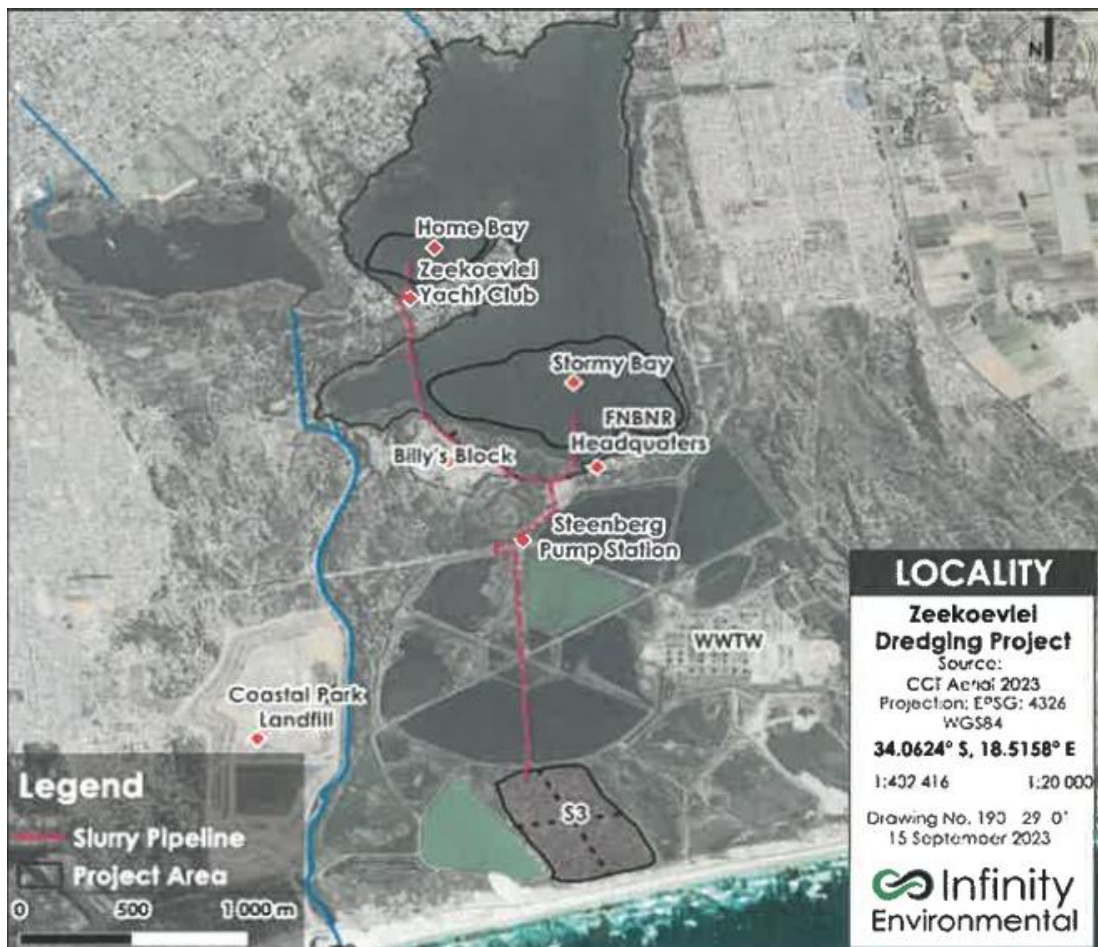


Figure 1: Site Plan (Figure sourced from the EA)

Work commenced on the site in March 2025 and at the time of the audit site inspection, on 11 September 2025, the construction programme was in month 6. GMC is the principal Contractor for the project. No subcontractors were appointed to the project at the time of this audit.

1.2 SCOPE AND TERMS OF REFERENCE

This audit and related report fulfil the requirements for external environmental audits as detailed in Regulation 34 of the NEMA (National Environmental Management Act (No 108) of 1998) EIA (Environmental Impact Assessment) Regulations as well as Conditions 26-30 of the EA, which are as described hereafter. The terms of reference for the audit were developed from these requirements as well as from current best management practice for environmental audits of this nature.

1.2.1 EA and EMPr requirements

Conditions 27 and 28 of the EA require audits to be conducted on the project's compliance with the conditions of the issued Authorisation and EMPr, per Section 34 of the NEMA EIA Regulations and per the frequency indicated in the EMPr, which is: 3 months after commencement with dredging activities, every six months thereafter and at the end of the implementation phase. The EA requires that the completion audit report be submitted within 30 days of the completion of implementation (site handover) and the final audit report within 30 days of completion of rehabilitation activities.

1.2.2 NEMA EIA Regulation 34 Requirements

NEMA Regulation 34 requires the holder of the Authorisation to ensure that compliance with the conditions of the EA and EMPr is audited by an independent person with relevant environmental auditing expertise and submit an environmental audit report to the competent authority (in this case, the DFFE) at intervals as indicated in the EA, and including the contents specified in Appendix 7 of the NEMA EIA Regulations 2014 (as amended).

The Appendix 7 content requirements are tabulated as follows. The corresponding section number of this report where this is addressed is provided here as a cross-reference to demonstrate that this report includes the required content.

Appendix 7 of the NEMA Regulations requirement	Corresponding section in this audit report
(1) Provide recommendations regarding the need to amend the EMPr;	Section 4
(2a) Report on the level of compliance with the conditions of the EA and the EMPr and the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr;	Section 3
(2b) Identify and assess any new impacts and risks as a result of undertaking the activity;	Section 4
(2c,d) Evaluate the effectiveness of the EMPr and any shortcomings;	Section 4
(2e) Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.	Section 4
(3.1 a) contain the details of the independent person who prepared the environmental audit report and their expertise;	Section 6
(3.1 b) declaration that the independent auditor is independent;	Section 6

(3.1 c) indication of the scope of, and the purpose for which, the environmental audit report was prepared;	Section 1
(3.1 d) description of the methodology adopted in preparing the audit report;	Section 2
(3.1 e) indication of the ability of the EMPr to sufficiently provide for the avoidance, management and mitigation of the environmental impacts associated with the undertaking of the activity on an ongoing basis and the closure of the facility and ensure compliance with the provisions of the EA and EMPr	Section 4
(3.1 f) a description of any assumptions made, and any uncertainties or gaps in knowledge;	Section 1.3
(3.1 g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;	Section 2
(3.1 h) summary and copies of any comments that were received during any consultation process; and	n/a
(3.1 i) any other information required by the competent authority.	EA Condition 13 described in section 1.2.1

1.2.3 Terms of reference for this audit

The terms of reference for this audit are as follows:

- **Prepare for the audit** - review the project EA, EMPr and other relevant background documents, and prepare information requirements and checklists for the audit;
- **Audit - site inspection, interviews and document review:** Conduct a site inspection, interview* relevant management and construction personnel/project consultants and review submitted documentary evidence to verify compliance of the development with the Conditions of the EA and EMPr requirements (* interviews can be done at the time of the site inspection, telephonically or information can be requested via email);
- **Review the EMPr** in terms of its effectiveness and scope to mitigate environmental risks/impacts on the site, based on the findings of the site inspection, interviews and compliance audit and recommend EMPr amendments if deemed required;
- **Draft audit report** of findings and recommendations and issue draft to relevant project personnel to check for accuracy and fairness and provide any missing information;
- **Finalise the audit report** and submit to the DFFE within the required time frames.

1.3 ASSUMPTIONS AND LIMITATIONS

Assumptions are:

- It is assumed that all information received from the project personnel/consultants is accurate and correct.

Limitations to the study are:

- This audit is undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014 (as amended). It is not a full legal compliance audit of all applicable environmental legislation. The scope is restricted to assessing compliance with the Environmental Authorisation (EA) conditions and Environmental Management

Programme (EMPr) requirements relevant to this project and applicable to the phase of work undertaken during this audit period.

- The audit period covers the time since the commencement of project activities, or the previous audit (where applicable), up to the date of this audit. Findings are therefore based on both conditions observed during the audit inspection and records of environmental performance over the audit period.
- As the audit inspection represents a single point in time, it cannot directly verify the management of all activities or capture contraventions that were not observable or documented.
- The audit findings and conclusions are based on the auditor's observations and on information provided by project personnel. This information has been assumed to be correct. Wherever possible, verification was undertaken through visual inspection or review of supporting documentation. The auditor cannot be held responsible for findings or conclusions resulting from inaccurate or incomplete information, or from information withheld or not made available during the audit.

2 METHODOLOGY

2.1 Approach

The auditor tabulated requirements from the EA and EMPr, in the Audit Checklist in Section 2.2 that follows. These are the items which have been investigated and assessed during the audit. The audit site inspection was undertaken on the 11th of September 2025 by auditor Christine Rabie, accompanied by the Development's appointed Environmental Control Officers, Jeremy Rose and Tom Smythe, and the principal Contractor's Environmental Officer, Ms Bulelwa Nonjaca.

Documentary information and evidence were supplied by the ECO and/or inspected on site as follows:

- **Burning of reedbed** – photographs from the burn undertaken in May 2024.
- **Construction contract excerpt** – demonstrating the inclusion of the EMPr in the construction contract.
- **Environmental Authorisation:** Ref: 14/12/16/3/3/1/2837 issued on 16 April 2024, as amended on 25 April 2025.
- **Environmental Management Programme:** *Proposed Dredging of the Zeekoevlei DFFE REF. 14/12/16/3/3/1/2837*, Infinity Environmental, January 2024).
- **Environmental Awareness Induction Registers**, presented by ECO, dated 14 and 26 March 2025, and various induction and Toolbox Talk registers and content was viewed in the site file.
- **ECO Reports:** March – August 2025, Infinity.
- **Environmental Method Statements** – Zeekoevlei - Site Establishment 152Q-2023-24-GMC-MS001; Dredger Assembly and Associated Services; GMC Environmental Management Plan.
- **Notification of Commencement**, Infinity, 13 January 2025.
- **Notification of I&APs of the EA decision**, Infinity Environmental, letter via e-mail dated 4 April 2024.
- **Registration of General Authorisation**, Department of Water and Sanitation, Ref. No: WU25674, letter dated 11 July 2023

- **Water Quality Monitoring Reports** (including background, pre-dredge and post-dredge samples) – Results for 10 July, and 29 August 2025.

The Audit Checklist was completed following the site inspection, interviews, and review of documentary evidence, where compliance with each authorisation condition and EMPr requirement (applicable to the implementation phase) was assessed and classified. Recommendations are made based on the findings of the compliance audit as well as the review of the relevance of the EMPr to the current site conditions.

3 COMPLIANCE AUDIT

3.1 Compliance Checklist: Notes and key to compliance columns:

Compliance = where a condition of the EA/EMPr has been complied with and there is no evidence of significant environmental impact or damage, or where impact was expected, that the required mitigation actions were undertaken to address such impact or damage.

Not Applicable/Not Yet Required = where a condition/requirement of the EA/EMPr is not currently applicable to or required for the project (reason to be motivated), e.g. the phase of work, activity not yet started.

Non Compliance = where a condition of the EA/EMPr has not been complied with. Comment will be made regarding whether there is evidence of or potential for any significant environmental impact or damage or legal liability as a result of the non-compliance.

Noted = where a condition of the EA/EMPr is not related to a specific action required of the project team, but rather a general statement.

Partial Compliance = where a condition of the EA/EMPr has been complied with in part, but additional management/administration action was/is required to gain full compliance.

Note: Where partial compliance results in significant environmental impact, damage, or legal liability, the finding will be categorised as Non-Compliance.

Unverified = where there is no visual or documentary evidence available to verify compliance/non-compliance.

The completed Compliance Checklist of findings follows:

3.2 Compliance Audit Findings:

3.2.1 Compliance with the Conditions of the Environmental Authorisation

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
1.	The dredging of the Zeekoevlei within False Bay Nature Reserve (FBNR), City of Cape Town, Western Cape, is approved, as per the geographic coordinates cited in the (EA) table.	COMPLIANT	The dredging activities are taking place in the approved location.
2.	(As amended) The preferred activity and technology alternatives are approved, and dredging must be implemented in both Home Bay and Stormy Bay, with Home Bay to be fully dredged prior to the end of the project.	COMPLIANT	Dredging has commenced in Stormy Bay. Dredging at Home Bay had not yet commenced at the time of this audit.
3.	Beneficial use of the dried organic material is approved as an end use alternative and must be implemented.	NOT YET APPLICABLE	The beneficial use will be confirmed once the material has dried and has been tested for suitability for proposed end uses, e.g. fertiliser for the agricultural sector.
4.	Pond S3 is approved as the proposed site for dewatering and storage of dredged material until it is removed for beneficial use.	COMPLIANT	Pond S3 is in use.
5.	Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.	NOTED	As confirmed in this audit report.
6.	The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant, or person rendering a service to the holder of the authorisation.	COMPLIANT	The appointed ECO acts as the client agent to monitor and confirm that the EA and EMPr are being complied with by all persons on site.
7.	The activities authorised must only be carried out at the property as described (in the EA).	COMPLIANT	The authorised activities are taking place in the approved location/s.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
8.	Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.	COMPLIANT	The original EA was amended to allow dredging to commence in Stormy Bay to allow the dredger and pipeline to be fully commissioned and tested first in the area closest to the site camp and the dewatering area, without having to initially construct a long floating pipeline. After dredging part of Stormy Bay, the dredger will move to Home Bay to completely dredge that area before returning to Stormy Bay. This amendment was authorised by the DFFE on 25 April 2025 (DFFE Ref: 14/12/16/3/3/1/2837/AM1)
9.	The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.	NOT APPLICABLE	No change of ownership has taken place.
10.	This activity must commence within a period of ten (10) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made for the activity to be undertaken.	COMPLIANT	The activity has commenced within the validity period.
11.	Construction/Activities must be completed within ten (10) years of the commencement of the activity on site.	COMPLIANT	Activities are not yet completed, but are on track to be completed within 10 years. (Dredging is anticipated to be completed in 2027, with beneficial use of dried dredging material continuing thereafter.)
12.	Commencement with one activity listed in terms of this environmental authorisation constitutes commencement of all authorised activities.	NOTED	
13.	The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.	COMPLIANT	I&APs were informed about the EA on April 23, 2004, which was seven days after it was issued.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
14.	The notification referred to must: 14.1. specify the date on which the authorisation was issued. 14.2. inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014. 14.3. advise the interested and affected party that a copy of the authorisation will be furnished on request; and 14.4. give the reasons of the Competent Authority for the decision.	COMPLIANT	The required information is included in the notification.
15.	The authorised activity must not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.	COMPLIANT	The activities commenced outside of the appeal period. No appeals were lodged.
16.	The Environmental Management Programme (EMPr — Appendix B) submitted as part of the final BAR dated January 2024 is approved and must be implemented and adhered to.	COMPLIANT	The EMPr is implemented on site, as monitored by the ECO and confirmed by this audit report.
17.	The EMPr must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.	COMPLIANT	The EMPr is included in the contract document (as verified in the Contract Environmental Specification, which lists the EMPr as an annexure.)
18.	Changes to the approved EMPr must be submitted in accordance with the EIA Regulations applicable at the time.	NOT APPLICABLE	No changes have been made or applied for.
19.	The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the basic assessment be discovered.	NOTED	

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
20.	The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 25 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the environmental authorisation or EMPr.	NOT YET REQUIRED	No amendments have been recommended by the auditor following this audit.
21.	The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.		
22.	The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of the EIA Regulations, 2014 as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.		
23.	In assessing whether to grant approval of an EMPr which has been updated because of an audit, the Department will consider the processes prescribed in Regulation 35 of the EIA Regulations, 2014 as amended. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.	NOTED	
24.	The holder of the authorisation must apply for an amendment of an EMPr, if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of the EIA Regulations, 2014, as amended. The holder of the authorisation must request comments on the proposed amendments to the impact management outcomes of the EMPr or amendments to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.	NOT APPLICABLE	No EMPr amendments have been applied for to date.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
25.	The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction/implementation phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr. 25.1. The ECO must be appointed before commencement of any authorised activities. 25.2. Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department. 25.3. The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO. 25.4. The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.	COMPLIANT	Infinity has been appointed as the ECO for the project, prior to commencement of the authorised activities on site, with contact details provided in the Notification of Commencement. Compliance monitoring by the ECO is recorded in the monthly ECO reports (as reviewed by the auditor).
26.	All documentation e.g., audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the Director: Compliance Monitoring of the Department.	COMPLIANT	The correspondence to date (notification of Commencement) has been submitted to the Director of Compliance Monitoring.
27.	The holder of the environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department.	COMPLIANT	As confirmed by this audit report.
28.	The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMPr, considering the processes for such auditing as prescribed in Regulation 34 of the EIA Regulations, 2014 as amended.	COMPLIANT	This first audit has been undertaken within 3 months of dredging commencing (on 30 June 2025), as required by the EMPr.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
29.	The holder of the authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction/implementation phase (i.e., within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.	NOT YET APPLICABLE	
30.	The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014 as amended and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved EMPr.	COMPLIANT	This audit report is compliant with the requirements, as confirmed by the table in section 1.2.2 of this audit report.
31.	Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	COMPLIANT	Confirmed in the site file.
32.	A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.	COMPLIANT	A notification of commencement was submitted by Infinity to the DFFE on 13 January 2025, in good time before the commencement of activities on site (in March 2025).
33.	A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.	NOT YET REQUIRED	
34.	Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and Competent Authority at that time.	NOT APPLICABLE	
35.	Removal of dredged material from and rehabilitation of Pond S3 should take place within ten years of commencement.	NOT YET REQUIRED	Removal of dredged material has not yet commenced; there is enough time to undertake this removal within the ten-year time frame.
36.	The use of guy wires or lateral support cables is not permitted.	COMPLIANT	No use of guy/lateral support wires was observed on site during the audit inspection.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
37.	Mitigation measures as provided for in the specialist reports must be implemented and adhered to.	COMPLIANT	These are included in the EMP, which is monitored by the ECO and audited by the external auditor.
38.	Remove reedbed habitat (cut and/or burn) at Pond S3 well ahead of anticipated African Marsh Harrier (AMH) breeding season (optimally April-June) to prevent AMH pair from selecting Pond S3 as nesting habitat during project and encouraging use of other reedbeds nearby.	COMPLIANT	The reed-bed at Pond S3 was burnt in Autumn 2024. No AMH breeding activity has been recorded at the pond since the commencement of project activities (per avifaunal monitoring surveys undertaken by AviSense in 2025).
39.	Monitoring efforts in terms of Avifauna, must be adhered to as specified by the Avifaunal assessment.	COMPLIANT	Avifaunal monitoring is being undertaken by AviSense as required.
40.	Should any archaeological sites, artefacts, paleontological fossils, or graves be exposed during construction/ implementation work, work in the immediate vicinity of the find must be stopped, the South African Heritage Resources Agency (SAHRA) must be informed, and the services of an accredited heritage professional obtained for an assessment of the heritage resources.	NOT APPLICABLE	No archaeological or paleontological discoveries were reported.
41.	The City of Cape Town must actively engage in efforts to source beneficial uses of the dredged material and facilitate its removal from Pond S3 — a maximum period of ten years from commencement of dredging is allowed for the full removal of dredged material from the FBNR to beneficial or alternative uses, and commencement of the removal of material for beneficial use must have commenced within five years of commencement of dredging.	NOT YET REQUIRED	Beneficial use will be determined/confirmed once significant material has dried, and it can be tested.
42.	Pre-emptive efforts in reed-clearing and dredging of shoreline sediments and solid waste should be implemented during the autumn drawdown period immediately preceding dredging commencement.	NON-COMPLIANT	No evidence that the required pre-emptive reed-clearing and shoreline works were undertaken prior to dredging. Refer to EMP audit item 3.2.2 (6) for detailed comments on this finding and the auditor's recommendation to amend the EMP to accommodate the work still to be done in section 4.3 of this report, since the originally specified timing can no longer be met. The required works must still be implemented and verified to achieve compliance, and the adjusted timing is not expected to alter the effectiveness or environmental benefit of the outcome.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
43.	The proposed pipeline over the Zeekoevlei Peninsula must be located as close as feasibly possible to the eastern boundary of Erf 259 and Erf 263 and within a corridor of no further than 10m from the boundary. Allowance must be made for brush-cutting of woody invasive alien vegetation that encroaches into this corridor, and the route must be demarcated on site by a wetland ecologist and a FBNR management representative prior to its clearing, to allow for routing that minimises its impact. Where the pipeline encroaches close to less-impact wetland areas, allowance should be made for sandbag bunding of these portions of its route if required.	COMPLIANT	The pipeline has not been installed as yet, but the ECO confirmed that the freshwater ecologist has visited the site, and the best route/method has been determined. This is planned to be confirmed in a Method Statement prior to implementation.
44.	Measures to minimise noise generation by machinery should be implemented as far as practically possible.	COMPLIANT	No issues were recorded in the ECO reports or during the audit inspection.
45.	All declared alien invasive species must be identified and managed in accordance with the Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983).	COMPLIANT	No alien and invasive plant species were recorded in the working or site camp area apart from water hyacinth noted in the S3 receiving pond, which is not this project's responsibility to address (part of routine maintenance of the FBNR).
46.	Locate the lay-down area and construction camp in an area that is already disturbed.	COMPLIANT	The lay-down area and construction camp are located in the approved, non-sensitive area (near the reserve offices).
47.	All access and service roads must follow the existing road network as far as practically possible.	COMPLIANT	Confirmed in the ECO reports and on-site.
48.	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environment Management Waste Act, 2008 (Act No.59 of 2008).	COMPLIANT	Confirmed on site, and in the waste disposal records viewed. While this was up to standard at the time of the audit inspection, this has not been consistently implemented on the project since commencement, as per comments and rating in section 3.2.2 (EMPr audit) item 20 of this audit report.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
49.	A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying-49.1. at the site of the authorised activity. 49.2. to anyone on request; and49.3. where the holder of the Environmental Authorisation has a website, on such publicly accessible website.	COMPLIANT	Confirmed in the site file.
50.	National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.	NOTED	

3.2.2 Compliance with the Requirements of the Environmental Management Programme

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
<p>NOTE: This audit section is principally concerned with the development's compliance in achieving the required EMPr <u>Outcomes/Objectives</u>, highlighted in bold text under the specification section, though comment is also made regarding the implementation the related <u>Actions/Methods</u> as set out in the EMPr (not listed in this checklist). It is noted that actions/methods in the EMPr may be amended by the project team as required to practically and effectively achieve the required Outcomes, but EMPr Outcomes cannot be amended without following a formal EMPr Amendment and DFFE approval process.</p>				
<p>GENERAL MANAGEMENT & ADMINISTRATION</p>				
1.	EMP 3.2/ 5.1	<p>ECO appointed for the duration of the construction phase, including responsibility for:</p> <ul style="list-style-type: none"> - Periodic inspections – weekly for first 3 months, monthly thereafter) - meet on site with the Contractor prior to construction to confirm designated development and no-go areas. - Request and review method statements - Ensure that the contractors and sub-contractors and their employees have received the appropriate environmental awareness training. - Identify corrective measures if transgressions occur - Identify and make amendments to the EMPr where appropriate. - (Conduct an environmental inspection on completion of the construction period and prepare a close-out report. – only due after construction completion) 	COMPLIANT	<p>An ECO (Infinity) has been appointed.</p> <p>As verified in the ECO reports, on average, weekly inspections were undertaken.</p> <p>The ECO has requested and reviewed environmental method statements submitted to date. All MS required at the time of the audit were in place (pers. comm Tom Smythe), though the ECO reports noted delays in submission of various MS in the preceding months.</p> <p>The ECO has briefed the contractor management staff regarding environmental management (2 sessions presented in March 2025) – as evidenced by the attendance registers viewed on the site file.</p> <p>Copies of the ECO compliance/recommendations reports for March – August 2025 were provided to the auditor.</p>
2.	EMP 3.3	<p>Ecologist/s appointed to undertake baseline, implementation and post-dredging monitoring: invertebrates, water quality (monthly), and avifaunal (bi-weekly) surveys</p>	COMPLIANT	<p>Avifaunal surveys have been undertaken by AviSense (reports are attached to the ECO reports of the relevant months).</p> <p>Water quality reports were provided by the ECO for July and August 2025, which reports indicated that the 'post-dredge' site is comparable to the background site, indicating no immediate deleterious impacts associated with the dredging process. The ECO confirmed that the baseline invertebrate survey was concluded by Dr Liz Day, whose report is still awaited.</p>

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
3.	EMP 3.4/ 5.2	<p>Contractor to ensure:</p> <ul style="list-style-type: none"> - All employees and all subcontractors that work on the site for longer than two days receive environmental awareness training within one week of being on site. - Designate an Environmental Officer to monitor and report on the daily activities on-site during the construction period. 	PARTIALLY COMPLIANT	<p>After the ECO's environmental awareness inductions, the contractor has been presenting toolbox talks, as verified by the content and attendance registers viewed in the environmental site file.</p> <p>Ms Bulelwa Nonjaca has been designated as the Contractor's Designated Environmental Officer on site.</p> <p>While records were up to date at the time of the audit inspection, the ECO reports note that the EO was frequently absent from the site, and daily/weekly checklists were not all completed or did not record the known issues as noted by the ECO). Furthermore, some method statement submissions were incomplete or late, and training registers were not always up to date. The Complaints register was not always up to date to reflect known complaints. Therefore, this is marked as a partial compliance. This appears to be a systemic/support issue and should be addressed internally by the Contractor to ensure smooth implementation going forward.</p> <p>RECOMMENDATION:</p> <p>a) Contractor to ensure that the EO role and related administration tasks are supported. This may include additional training, resourcing or management oversight and support.</p>
PRE- IMPLEMENTATION ENVIRONMENTAL MANAGEMENT PLAN				
4.	EMP 4.1 Compliance with legislative and other requirements	<p>The dredging of Zeekoevlei is conducted in compliance with all relevant legislation and is not in conflict with existing approvals and authorisations.</p> <ul style="list-style-type: none"> - Water use registration - Update MMP 	COMPLIANT	<p>Works are compliant with existing approvals and authorisations.</p> <ul style="list-style-type: none"> • A General Water Use Registration has been confirmed - Ref. No:WU25674. • Mr Rose from Infinity stated: <i>"The City's catchment-wide MMPs are undergoing a major review at the moment. We will give input to the Zeekoe one when it is underway, but in response to this specialist recommendation, we included an MMP in the EMP, to cover these activities. There was therefore no need to update the catchment-wide one specifically."</i>

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
5.	EMP 4.2 Bird nesting habitat and storage capacity in Pond S3	Maximise capacity for sediment and minimise the attractiveness of Pond S3 as breeding habitat for African Marsh Harrier and other bird species. <ul style="list-style-type: none"> - Prescribed burn/cut reeds S3 pond (April – June) - Isolate S3 	COMPLIANT	The reeds at Pond S3 were cut, and bund walls were installed as required. Albeit that the delayed start meant that significant reed regrowth had occurred by the time works commenced.
6.	EMP 4.3 Impacts of dredging programme on typical vlei level draw down outcomes for solid waste and shoreline sediments	Provide for reed-clearing, solid waste removal and shoreline dredging equivalent to a two year effort under normal drawdown conditions, before dredging commences <ul style="list-style-type: none"> - Reed clearing and dredging of shoreline in autumn prior to commencement - Target upper vlei reaches, near Big Lotus River mouth - Amend MMP used by shoreline residents for single late summer reedbed maintenance 	NON - COMPLIANT	No evidence that the required extraordinary reed-clearing, solid waste removal, and shoreline dredging were undertaken prior to dredging, as specified in the EMPr. Mr Rose (Infinity Environmental) confirmed there is no record of additional effort in this regard, potentially due to procurement constraints. The requirement is therefore considered non-compliant for the audit period. RECOMMENDATION: b) The specified reed-clearing, solid waste removal, and shoreline dredging must still be undertaken, and documentary evidence provided. Since the required timing (“before dredging commences”) can no longer be achieved, an EMPr amendment should be pursued to adjust the specification wording, ensuring that the intended environmental management actions are still delivered (albeit later than originally scheduled). See audit item 4 above regarding the updating of the MMP.
7.	EMP 4.4 Impacts on seasonal wetland margins on erf 259 and 263 on the Zeekoevlei Peninsula	Locate pipeline route over peninsula to avoid or minimise impacts on sensitive seasonal wetlands <ul style="list-style-type: none"> - Demarcate route (close as possible to the eastern boundary of erf 259 and avoiding sensitive seasonal wetland), brush cut, sandbag bunding if required 	COMPLIANT	Planning work is compliant. The physical pipeline has not yet been laid. This pipeline has not been installed as yet, but the ECO confirmed that the freshwater ecologist has visited the site, and the best route/method has been determined. This is planned to be confirmed in a Method Statement prior to implementation.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
				RECOMMENDATION: c) Method Statement for pipeline route and installation to be signed, and no-go area demarcation to be in place, before commencing with pipe installation over the peninsula.
IMPLEMENTATION PHASE ENVIRONMENTAL MANAGEMENT PLAN				
8.	EMP 5.1 Disturbance and mortality of fauna	Reduce the levels of disturbance and the risk to fauna <ul style="list-style-type: none"> - Operator environmental awareness training - Quadrant division of Pond S3 - Timing peninsula works outside the western leopard toad breeding season, exclude from work area Avoid impacts on threatened bird species, particularly the African Marsh Harrier <ul style="list-style-type: none"> - Avifauna surveys 	COMPLIANT	No negative impact on fauna was recorded. Contractor staff have undergone environmental awareness training (as evidenced by attendance registers). Quadrant division of Pond S3 has been undertaken through the installation of a compacted soil/fill bund wall. Avifaunal monitoring has been undertaken by AviSense (reports attached to the ECO reports in relevant months).
9.	EMP 5.2 Pollution of surface water and soils due to hydrocarbon spills from dredge vessels	Reduce or avoid contamination of surface water, soil, groundwater and vegetation and/or fauna <ul style="list-style-type: none"> - Method statement for refuelling - Spill response equipment/material available - Refuelling under controlled conditions. 	PARTIALLY COMPLIANT	Compliant at the time of the audit inspection but some issues were recorded during the audit period. The ECO reports note late submission and finalisation of the refuelling method statement, and drip trays were not always used during refuelling. Spill response materials were confirmed on site at the time of the audit inspection. No outstanding issues were recorded at the time of the audit inspection.
10.	EMP 5.3 Pollution of surface water and soils due to spills or leakage of dredge slurry	Pollution of surface water and soils due to spills or leakage of dredge slurry is avoided or minimised <ul style="list-style-type: none"> - No leaking/broken pipelines, or rapid repair Malicious or unintentional damage to dredge infrastructure is avoided and minimised.	COMPLIANT	No pollution due to dredge slurry spills was recorded. No malicious damage to the dredging infrastructure was recorded.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
11.	EMP 5.4 Pollution of surface water and soils due to general construction activities	Pollution of surface water and soils due to general construction activities is avoided or minimised. <ul style="list-style-type: none"> - Camp and toilet facilities >30m from the edge of the vlei - Adequate ablution facilities - Secure (bunded) fuel, oil, and chemicals storage (+MS) - Suitable spill response materials /record of spill events 	PARTIALLY COMPLIANT	<p>Compliant at the time of the audit inspection but some issues were recorded during the audit period.</p> <p>The camp and toilet facilities are located outside of the prescribed vlei buffer zone. Fuel spill response materials were confirmed on site.</p> <p>The fuel storage area for the mobile diesel tanker and drums was up to standard at the time of the audit inspection, but the ECO noted the fuel storage area to be inadequate (no bunding and signage of diesel flow bins and other fuel containers) in months prior. A fuel spill (terrestrial) was recorded at the site camp on 4 July 2025 (Ref: ECO Report July 2025), spill kit was used, but spill boom left out over weekend in heavy rain that may have contaminated the surrounding area. The ECO reports noted that toilets at Pond S3 were not always secured. No outstanding issues were recorded at the time of the audit inspection.</p> <p>RECOMMENDATION:</p> <p>d) Ensure bunded, compliant fuel storage and spill response capacity at all times, with regular supervision and documented checks.</p>
12.	EMP 5.5 Pollution of the Zeekoe Canal and False Bay due to the use of coagulants / flocculants in Pond S3	Prevent environmental contamination because of flocculant and coagulant use. <ul style="list-style-type: none"> - No supernatant water containing coagulants or flocculants discharged directly into vlei - Water discharged into the vlei meets standards 	COMPLIANT	<p>No discharge of supernatant water directly into the vlei was reported.</p> <p>Water extracted from the settling area in Pond S3 is fed via a return pipeline to the WWTW and not discharged directly into the vlei.</p>
13.	EMP 5.6 Alien invasive and weed species in Pond S3	Control of Alien and weedy species <ul style="list-style-type: none"> - Water hyacinth and other weedy species controlled by the FBNR per their integrated reserve plan as needed. 	COMPLIANT	<p>No AIS control requirements for this project were recorded.</p> <p>Water hyacinth growth was recorded in the S3 receiving pond, but this is outside of this project's scope to control and is managed per the FBNR management plan. No issues affecting this project were reported.</p>

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
14.	EMP 5.7 Safety management at Pond S3	Prevent any damage or harm to humans and or property as a result of ongoing project works in and around Pond S3 <ul style="list-style-type: none"> - Clear safety signage at Pond S3 	COMPLIANT	No harm to humans or property was noted at pond S3. Construction safety signage, including “Road closed Ahead” was observed on site at Pond S3.
15.	EMP 5.8 Erosion and sedimentation	Prevent discharge of sediment-laden water into watercourses and conservation areas <ul style="list-style-type: none"> - No sediment-laden water is discharged directly into the Zeekoe Canal 	COMPLIANT	No sediment discharge outside of designated pond S3 was recorded. No erosion issues were observed. No issues related to sediment-laden water discharge into the Zeekoe Canal were recorded.
16.	EMP 5.9 Conflict with recreational uses and adjacent residential areas	Minimize the disturbance and inconvenience to recreational users of Zeekoevlei and adjacent residential areas <ul style="list-style-type: none"> - No conflicts with recreational events/regattas - Adjacent landowner disruption minimised - Complaints and concerns addressed promptly and correctly 	PARTIALLY COMPLIANT	No outstanding issues recorded at the time of the audit inspection. Damage to boats and poor complaint management were noted during the audit period. The ECO noted that the complaints register was not updated as required to record damage to rowing boats in May 2025 due to the lack of marker buoys on the pipeline. This was subsequently addressed in July 2025 (no dredging work was undertaken in June due to technical issues) and was in place at the time of the audit inspection (refer to photo sheet). RECOMMENDATION: e) Ensure that the complaints register is promptly updated, ensuring all new incidents (including third-party impacts) are formally logged and appropriately closed out.
17.	EMP 5.10 Visual impacts	Visual disturbance is minimised, especially in nature reserve areas used by the public <ul style="list-style-type: none"> - Location and screening of site camp/s - Management of laydown areas - Roof and screening of waste areas - No unnecessary signage/advertising 	COMPLIANT	Compliant. – Location and visual screening of the site camp, including waste management area and laydown areas, is/has been in good order.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
18.	EMP 5.11 Noise	<p>Noise disturbance is minimised or avoided.</p> <ul style="list-style-type: none"> - Maintained equipment - Working hours adhered to - No excessive noise to neighbouring residents (>70dB) /neighbours notified 	COMPLIANT	<p>No noise nuisance issues were recorded.</p> <p>No issues of unduly noisy equipment or exceedance of working hours was reported.</p>
19.	EMP5.12 Dust	<p>Prevent dust impacts on surrounding area.</p> <ul style="list-style-type: none"> - Haul road material/management - Covered loads - Dust impacts on residents minimised <p>Comply with the City of Cape Town's Air Quality Management By-law's provisions related to dust emissions.</p>	COMPLIANT	<p>No dust issues or by-law non-compliances were recorded.</p> <p>No dust issues were noted in the ECO reports, during the audit inspection or logged in the complaints register.</p>
20.	EMP 5.13 Waste management	<p>Manage waste in accordance with legislation and best practice methods.</p> <ul style="list-style-type: none"> - Designated waste management area - Legal waste disposal <p>Minimise the production of general waste</p> <ul style="list-style-type: none"> - Separation into general, recyclable and hazardous waste streams <p>Prevent pollution or contamination due to improper waste handling or storage on site.</p> <ul style="list-style-type: none"> - Daily litter collection 	PARTIALLY COMPLIANT	<p>Waste management to standard at the time of the audit; however, issues were recorded during the contract period.</p> <p>At the time of the audit, a waste management area was designated in the site camp with a roof covering and separate bins for general, recyclable and hazardous wastes. However, the ECO reports indicate that waste separation was not up to standard for much of the audit period.</p> <p>Waste disposal register and records were up to date in the site file at the time of the audit inspection. The ECO reports noted that these were not always up to date/filed during the audit period.</p> <p>The site was litter-free at the time of the audit inspection. The ECO reports, however, noted litter on site that had not been attended to as requested (e.g. collected litter not removed from Pond S3 was not removed from the area for several months).</p> <p>Therefore, despite management being up to standard at the time of the audit inspection, a partial compliance is given for the audit period. The contractor's efforts to address the management shortcomings are acknowledged.</p>

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
				RECOMMENDATION: f) Maintain waste management systems to ensure effective separation, recycling, and record-keeping.
21.	EMP 5.14 Fire	Prevent damage to terrestrial vegetation or property from wildfires. - No fires permitted on site	COMPLIANT	No damage to terrestrial vegetation through fire was recorded. No fires were reported or observed made by the project staff.
22.	EMP 5.15	Prevent damage to or impacts on heritage resources, including graves, palaeontological, or archaeological resources - Chance find procedure	COMPLIANT	No archaeological or paleontological discoveries were reported.
23.	EMP 5.16 Water quality and ecological change due to dredge activities	Determine effectiveness and impact of dredge activities - Once off baseline invertebrate sampling before dredging, annually after dredging - Fortnightly water quality monitoring for the first 2 months, monthly thereafter (during dredging)	COMPLIANT	Monitoring is in progress. Water quality reports were provided by the ECO for July and August 2025, which reports indicated that the 'post-dredge' site is comparable to the background site, indicating no immediate deleterious impacts associated with the dredging process. The ECO confirmed that the baseline invertebrate survey was concluded by Dr Liz Day, whose report is still awaited.

4 EMPr REVIEW

4.1 Scope of the EMPr review

This review has been restricted to the sections of the EMPr relevant to the current audit period, namely the pre-implementation and implementation phase requirements as set out in Sections 4 and 5 of the EMPr.

4.2 Relevance/shortcomings of the EMPr

No shortcomings have been identified in the content of the EMPr; it remains relevant and adequate to manage the environmental risks associated with the project.

4.3 Recommendations for EMPr amendment

During this audit, one EMPr outcome was identified as requiring refinement in order to remain practically implementable, while still ensuring that the intended environmental management outcome is achieved.

EMPr Outcome 4.3 (Current wording):

“Provide for reed-clearing, solid waste removal and shoreline dredging equivalent to a two-year effort under normal drawdown conditions, **before dredging commences.**”

Audit Finding:

No evidence could be provided that the additional reed-clearing, solid waste removal, and shoreline dredging were undertaken prior to dredging, as required. The ECO confirmed that no extraordinary effort was made in this regard, possibly due to procurement and programme constraints. This has therefore been recorded as Non-Compliant in this audit report. Since the specified timing (“before dredging commences”) can no longer be achieved, the current wording of Outcome 4.3 will remain technically non-compliant for the duration of the project, even if the intended works are undertaken later.

Recommendation:

It is recommended that the EA holder, through their appointed EAP/ECO, prepare and submit an EMPr amendment to refine the wording of Outcome 4.3 and associated Action 4.3.1. The purpose of this amendment would be to adjust the timing of the required remedial effort while retaining the original management intent and environmental outcome.

Suggested revised wording:

- **Outcome 4.3:** “Provide for reed-clearing, solid waste removal and shoreline dredging equivalent to a two-year effort under normal drawdown conditions, **to be implemented in the first available autumn drawdown season during or after dredging activities, and in any event to be completed within 24 months of dredging completion.**”
- **Action 4.3.1:** “**Prepare and implement a Shoreline Remediation Implementation Plan** that specifies target areas, methods, sequencing, and environmental controls to achieve the required two-year equivalent reed-clearing, solid waste removal, and shoreline dredging effort. The plan must align works to the first suitable autumn drawdown season during or after dredging, and in any event be completed within 24 months of dredging completion.

Completion of this action must be confirmed through:

- documented KPIs (e.g. area treated, volumes dredged, reed biomass removed, waste quantities and lawful disposal records),
- geo-referenced photographic records, and
- independent verification by the ECO.
- Documented confirmation of these measures is required to achieve environmental closure of the project with respect to Outcome 4.3.”

Motivation:

- The environmental management intent and performance outcome remain unchanged — the same scale of reed-clearing, waste removal, and shoreline dredging must still be undertaken.
- The amendment relates only to **timing**, ensuring that the work is delivered at the earliest feasible opportunity during or after dredging, while still imposing a clear deadline (24 months after dredging completion).
- Mr Rose indicated that the City is undertaking modifications to the Zeekoevlei weir between January 2026 and June 2027, which will limit their ability to undertake the annual water level drawdowns and therefore the shoreline dredging. This has informed the proposed 24-month implementation window, to ensure that the specified timing can practically be met by the project.
- This approach avoids the situation where the project is recorded as permanently non-compliant, and ensures the intended environmental benefit is achieved under realistic programme and seasonal conditions.
- Implementing this amendment will enable the EA holder to demonstrate compliance once the work is completed, while maintaining accountability to deliver the outcome in line with audit findings.
- This approach is consistent with the provisions of the EA, which allow for EMPr updates where audit findings indicate a need for improved or adjusted mitigation.

All other implementation-phase specifications of the EMPr are considered relevant and effective to manage the anticipated environmental risks for the remainder of the project, subject only to any new risks or impacts that may arise from unforeseen activities or circumstances going forward.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This implementation-phase audit of the EA/EMPr conditions recorded **one non-compliance with the conditions of the EA and one non-compliance with the EMPr**, both relating to the shoreline reed-clearing, solid waste removal, and dredging requirement. Because the specified timing (“before dredging commences”) could not be met, the requirement remains technically non-compliant for the audit period, although the intended management outcome can still be achieved if the works are undertaken and verified at a later stage.

In addition, the audit found the project to be **partially compliant with five EMPr outcomes/objectives**. While the project was mostly compliant at the time of the audit inspection, a review of ECO reports for the audit period (March–August 2025) shows repeated and, in some cases, prolonged non-compliances relating to:

- hydrocarbon storage and spill management,
- waste separation and record-keeping,
- Environmental Officer (EO) presence and daily checklist completion, and
- updating of the complaints register.

While these issues were rectified before the audit inspection, their recurrence over several months points to systemic weaknesses in the Contractor’s environmental management systems and oversight. These lapses created residual risk of environmental impact and legal liability during the audit period, even if no significant harm was ultimately recorded.

The following recommendations arose from the audit:

- a) Contractor to ensure that the EO role and related administration tasks are supported. This may include additional training, resourcing or management oversight and support.
- b) The specified reed-clearing, solid waste removal, and shoreline dredging must still be undertaken, and documentary evidence provided. Since the required timing (“before dredging commences”) can no longer be achieved, an EMPr amendment should be pursued to adjust the specification wording, ensuring that the intended environmental management actions are still delivered (albeit later than originally scheduled).
- c) Method Statement for pipeline route and installation to be signed, and no-go area demarcation to be in place, before commencing with pipe installation over the peninsula.
- d) Ensure bunded, compliant fuel storage and spill response capacity at all times, with regular supervision and documented checks.
- e) Ensure that the complaints register is promptly updated, ensuring all new incidents (including third-party impacts) are formally logged and appropriately closed out.
- f) Maintain waste management systems to ensure effective separation, recycling, and record-keeping.

One amendment to the EMPr is recommended, relating to the shoreline reed-clearing, solid waste removal and dredging specification (EMPr section 4.3), to refine the timing requirement while retaining the original management intent and environmental outcome.

The next external audit report is due by **30 March 2026**.

Note: It is the responsibility of the EA holder or their agents to notify all potential and registered I&APs of the submission of this audit report within seven days of issue to the DFFE, and to make the report available to any interested party on request.

6 DECLARATIONS & CREDENTIALS OF THE INDEPENDENT AUDITOR

The auditor, as undersigned, declares their independence and expertise to undertake this audit and that every effort was made to conduct this audit in a thorough, professional, objective and fair manner.



Signed by **Christine M.M Rabie on 30 September 2025**

- B.Tech Environmental Management; ND Landscape Technology
- Professional Natural Scientist certified by the South African Council for Natural Scientific Professions in the field of Environmental Science – Reg. No. 400055/17
- 20+ years of directly applicable EA and EMPr environmental compliance auditing experience.

1 APPENDICES:

1.1 AUDIT PHOTO SHEET



PHOTO 1: Bunded and covered area for parking of diesel bowser and liquid hazmat drums



PHOTO 2: Haz mat locker



PHOTO 3: Hydrocarbon spill containment booms



PHOTO 4: Spill kit drum and waste drums behind



PHOTO 5: Drip trays in use at the site camp



PHOTO 6: Hazardous waste drum



PHOTO 7: Bund wall over S3 Pond



PHOTO 8: Dredging silt entering S3 pond



PHOTO 9 and 10: Pipe route through terrestrial vegetation area (between Billy's Block and the Zeekoevlei)– stabilised with geotextile to prevent erosion



PHOTO 11: Refuelling boat with flow bins – the holding area of the vessel is sealed and would contain any spills



PHOTO 12: Dredging vessel



PHOTO 13: Buoys marking the pipeline in the water

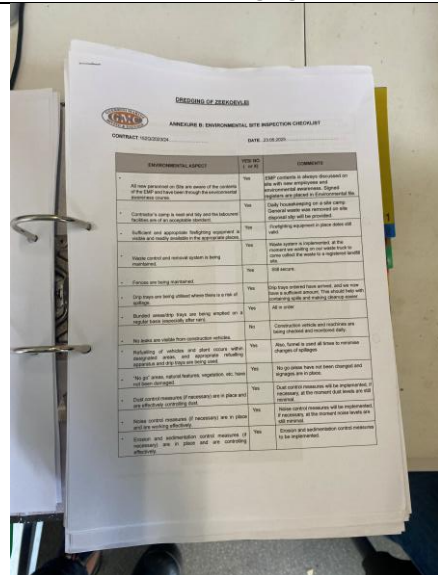


PHOTO 14: DEO site inspection checklist

