

26 June 2025

DEA&DP Reference: 16/3/3/1/A1/20/3002/22

**Department of Environmental Affairs and Development Planning
1 Dorp Street, Cape Town, 8001**

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Dear Kraigen and Keagan-Leigh,

SUBMISSION OF THE SECOND NEMA EIA REG 34 EXTERNAL AUDIT REPORT - CONSTRUCTION PHASE, JUNE 2025 - FOR THE CONSTRUCTION OF A NEW BULK OUTFALL PIPELINE AND THE REHABILITATION OF THE EXISTING BULK OUTFALL PIPELINE IN MONTAGUE GARDENS

Herewith enclosed please find the second external audit report, as required by condition 13.2 of the Environmental Authorisation (Ref. 16/3/3/1/A1/20/3002/22), issued on 22 June 2022 for this project.

In addition, for your department's records, we submit the revised EMPr (May 2025), as supported by this audit report.

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

Environmental Management Audit - NEMA EIA Reg 34 audit – 2 June 2025

Proposed New Bulk Outfall Sewer in Montague Gardens, Cape Town

DEA&DP Reference: 16/3/3/1/A1/20/3002/22

FINAL REPORT

26 JUNE 2025

**Prepared by:
Christine Rabie**

**Prepared for:
Bigen Africa Services Pty (Ltd)**

Executive Summary

This report presents the findings of the second external environmental audit conducted for the Montague Gardens Bulk Outfall Sewer project, as required in terms of Regulation 34 of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), and Condition E.13 of the Environmental Authorisation (EA) issued by DEA&DP on 22 June 2022 (Ref: 16/3/3/1/A1/20/3002/22).

The audit was undertaken on 2 June 2025 by independent auditor Christine Rabie and assessed compliance with the conditions of the EA and the associated Environmental Management Programme (EMPr), currently in its third revision (May 2025). The audit included a site inspection, review of documentation, and interviews with the Environmental Control Officers (ECO's) and Contractor's Environmental Officer (DEO).

At the time of audit, construction was well advanced and anticipated to conclude by year-end 2025. Overall, a high standard of environmental management was observed, and the site generally demonstrated good compliance with statutory and EMPr requirements.

A total of 21 EA conditions and key construction phase EMPr outcomes were assessed. Compliance was recorded for most requirements. However, non-compliance or partial compliance was identified with the following:

- EA Condition E.16: Pollution of surface and stormwater due to accidental infrastructure failures.
- EA Condition E.19: Incursion into the prescribed 15 m buffer zone of the Duikersvlei Canal due to unavoidable geotechnical constraints, also resulting in a burst water main that cause bank erosion.
- EMPr Outcome 4.1: Wetland pollution – sedimentation related to the above buffer zone incident as well as sedimentation of a stormwater canal.
- EMPr Outcome 4.8: Waste management best practice not complied with – housekeeping improvements are required at the Theo Marais site.

Recommendations from the report include:

- Finalising approval for the amendment of EA Condition E.19 to allow for reduced buffer width in the affected section (*POST AUDIT UPDATE: The EA amendment was received 25 June 2025*).
- Implementing and verifying corrective actions to stabilise and rehabilitate the Duikersvlei bank where it was eroded.
- Improving waste containment and control at the Theo Marais work area.

The performance of the Environmental Control Officer was of a high standard, particularly in the proactive identification of risks and responsive action taken to address incidents within the Duikersvlei buffer zone. The ECO's continuous monitoring and adaptive EMPr updates contributed positively to environmental compliance. This was further supported by the Contractor's Designated Environmental Officer, whose good document control and effective oversight of day-to-day environmental operations played a significant role in upholding the required standards on site.

The next and final audit is due within one year of completion of the construction phase.

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Abbreviations	
DEA&DP	Department of Environmental Affairs & Development Planning
DEO	Designated Environmental Officer (of the Contractor)
EA	Environmental Authorisation (<i>Ref: 16/3/3/1/A1/20/3002/22 issued on 22 June 2022</i>)
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme (<i>Environmental Management Programme: for the Proposed New Bulk Outfall Sewer In Montague Gardens, Cape Town, DEA&DP Ref. 16/3/3/1/A1/20/3002/22, Infinity Environmental March 2022</i>)
HCS	Hazardous Chemical Substances
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act (No 107) of 1998
MH	Manhole
MS	(Environmental) Method Statement
Designations and Definitions	
Auditor:	The external independent environmental auditor, Mrs Christine Rabie, who undertook this environmental management audit.
Contractor (Principal):	CSV Construction Pty (Ltd) (CSV)
Contractor's Construction Manager/Site Agent:	Mr Cobus Le Roux
(Contractor's) Environmental Officer (DEO):	Hilton Johnstone
EA Holder:	Department of Transport and Public Works
Environmental Control Officer (ECO):	Anathi Skweyiya and Jeremy Rose from Infinity Environmental Pty (Ltd. (Infinity)
Evidence:	Written records, physical evidence, observations or oral statements given during interviews. Where possible oral statements are collaborated 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 Bigen Africa Services Pty (Ltd) (Bigen) for this project.
Site/Development:	Project site located around the eastern and northern boundaries of the Montague Gardens Industrial area and specifically the area that contains the activities authorised by the EA (refer to sections B and C of the EA).

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions was appointed by Bigen 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: 16/3/3/1/A1/20/3002/22, as issued by the Department of Environmental Affairs & Development Planning (DEA&DP) on 22 June 2022, as well as the Environmental Management Programme (EMPr) for the project (latest version revision 3 issued in May 2025).

This is the second external audit undertaken for the project, undertaken 2 years after the first.

The development comprises (refer to the EA section B) the following:

- The authorised development entails the installation of a 1000 mm diameter gravity bulk sewer pipeline of approximately 4.8km length in Montague Gardens. The new reinforced concrete gravity bulk outfall sewer will be installed around the eastern and northern boundaries of the Montague Gardens Industrial area and will largely occur along servitudes and reserves of the affected properties. The pipeline will commence slightly west of the Bosmansdam Road and Montague Drive intersection at its southern extent and will then turn northwards between Railway Road and Station Road following Platinum Street, Esso Road and Stella Road before turning northwards again towards Koeberg Road where it will connect to the Koeberg Road Pump Station.
- The manholes will be covered with reinforced concrete slabs. In areas where the sewer will be adjacent to aquatic features and where indigenous vegetation of up to 1000 m² will be cleared, micro tunnelling will be utilised to minimise impacts while open trenching will be used in other sections.
- A minimum buffer of approximately 15m* between the proposed pipeline and the Duikersvlei canal and associated wetland will be applied to avoid any potential impacts on the freshwater features. Following the installation of the proposed bulk sewer, the existing Montague Bulk Sewer will be rehabilitated using the non-intrusive method of cure-in-place pipe. (**note that the EA Holder has applied to relax this requirement on one section of the pipeline due to unexpected geotechnical challenges and is pending approval*).

(Refer to the Site Plans in Figure 1 and 2, and Environmental Sensitivities Map in Figure 3 on the following page.)

The authorised listed activities have/will be undertaken on Erven 3624-RE, 8/RE, 1754, 1422-RE, 4672, CA245- 27-RE, 2434, RE/1428, RE/1432, 40200-RE, 9379/RE, RE/27, RE/7170, Erf 28, RE/38602, Erf 105727, RE/1607 and RE/20988, Montague Gardens (per Section C of the EA).

Construction commenced on the site on 15 March 2023 and at the time of the audit site inspection, on 2 June 2025, the construction programme was well advanced with completion expected towards year-end. CSV is the principal Contractor for the project.

Figure 1 and 2. Site plans (Figures sourced from EA 2022)

Site plan A

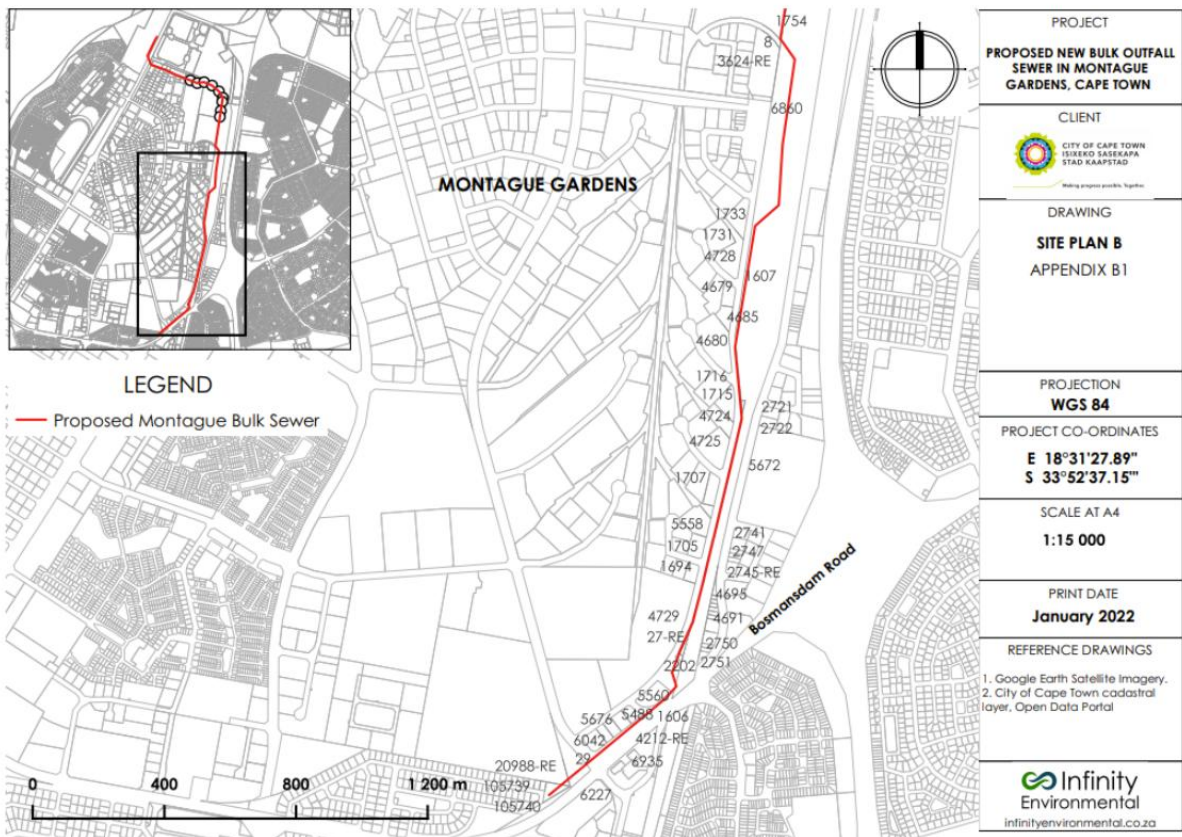
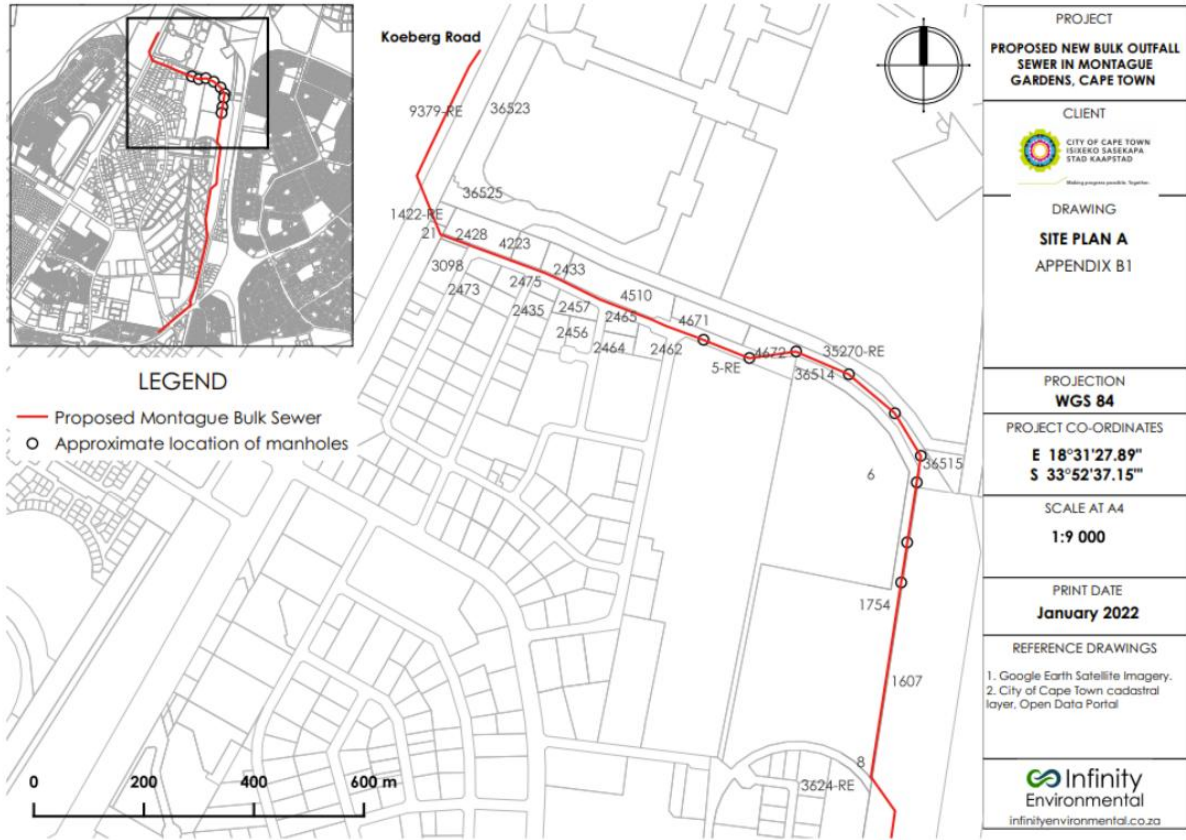


Figure 3. Environmental Sensitivities Map (Figures sourced from EMPr 2022)

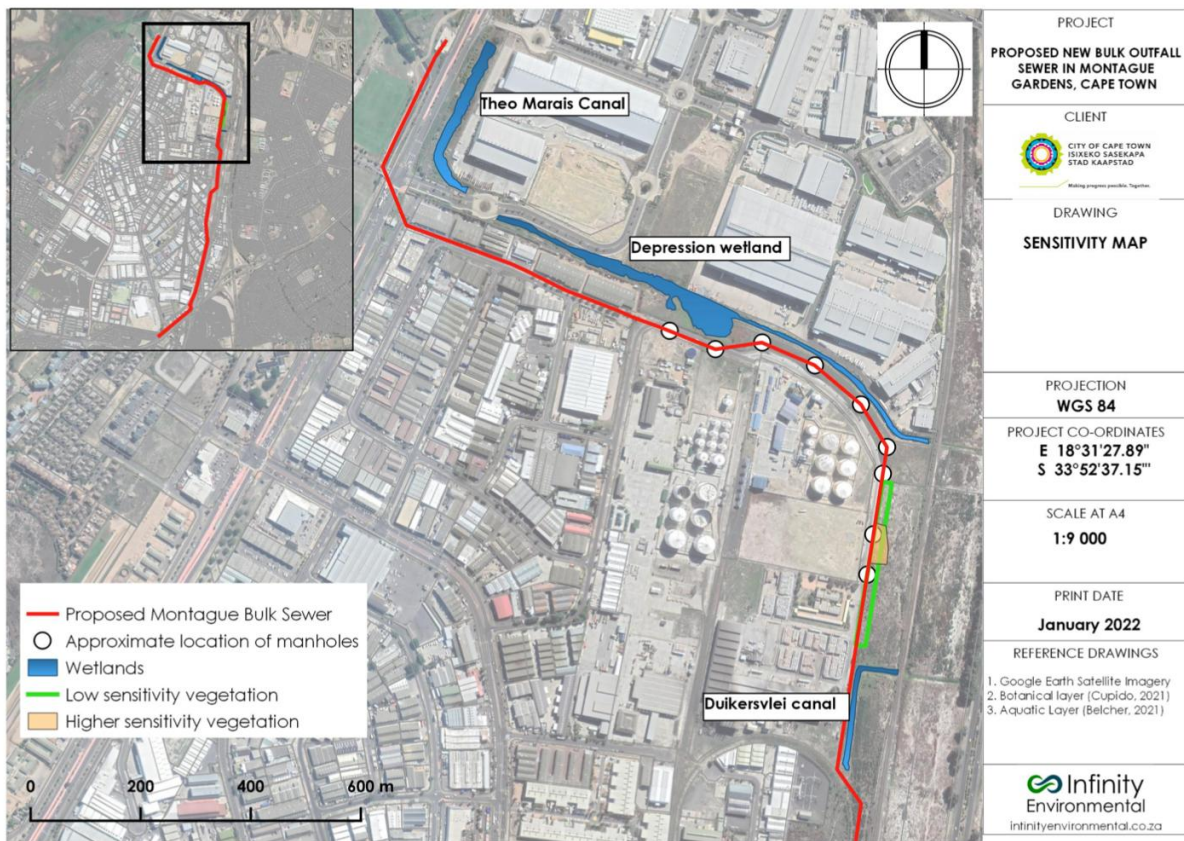


Figure 3. Environmental Sensitivity Map (Figure sourced from EMPr 2022)

1.2 SCOPE AND TERMS OF REFERENCE

This audit and related report fulfils 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 Condition E.13 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 requirements

Condition 13 of the EA requires the Holder of the EA to appoint an independent external auditor (not the ECO) to conduct an audit on compliance with the conditions of the issued Authorisation and EMPr, within 3 months of commencement of the listed activities (undertaken as required in June 2023), thereafter every 2 years during the construction period and a final audit within 1 year of completion of the development phase, per the requirements of Section 34 of the NEMA EIA Regulations 2014 (as amended). The EA holder must notify all potential and registered I&AP's of the submission of audit reports within 7 days thereof and make the report available to them on request. Reports must be submitted to the DEA&DP within 1 month of the completion of each audit.

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 DEA&DP) 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 latest version project EA, EMPr and other relevant background documents, and prepare information requirements and updated checklist 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 DEA&DP 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 is not a full Legal Compliance Audit (compliance with all applicable environmental legislation). The audit is restricted to requirements of the EA Conditions and EMPr requirements applicable to this project and relevant to the current phase of works (construction).
- The audit inspection observes a moment in time and cannot verify the management of all activities or record all contraventions/issues that are not directly observable or documented.
- The environmental audit findings and conclusions are based solely upon the observations of the auditor and information provided to the auditor by interviewed parties, which the auditor assumes to be correct. Wherever possible, verification in terms of visual inspection or examination of supporting documentation was used to confirm information provided. The auditor cannot be held responsible for findings and conclusions which resulted from inaccurate information, information being withheld from the auditor or which were not available during the course of 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 2nd of June 2025 by Christine Rabie, accompanied by the Development's appointed Environmental Control Officers, Anathi Skweyiya and Jeremy Rose as well as the Principal Contractor's Environmental Officer, Mr Hilton Johnson.

Documentation consulted and/or inspected on site as follows:

- **Environmental Authorization**, Ref: 16/3/3/1/A1/20/3002/22 issued on 22 June 2022.
- **Environmental Authorization Amendment Application, May 2025**
- **Revised Environmental Management Programme**, (*Environmental Management Programme: for the Proposed New Bulk Outfall Sewer in Montague Gardens, Cape Town, DEA&DP Ref. 16/3/3/1/A1/20/3002/22, Infinity, Version 3 as amended in May 2025.*)
- **Environmental Awareness Induction Registers, undertaken by CSV**, viewed in the site file, latest entry 29-05-2025.
- **ECO Environmental Audit Reports**: June 2023 – May 2025, Infinity.
- **Environmental Complaints Register**, CSV (in site file) – 2 complaints recorded.
- **Environmental Incident Register**, CSV (in site file) – 6 incidents recorded.
- **Environmental Method Statements and Method Statement Register**: (New/revised since previous audit) – 1. Clearing and Protection of Indigenous Vegetation (approved 14-08-2023) 2. Shoring with Steel Sheet Piles (approved 15-08-2023), 3. Emergency Preparedness including Sewage (approved 28-09-2023), 4. Solid Waste Management Bentonite (approved 28-09-2023), 5. Control of Sedimentation and Erosion (approved 12/12/2023), 6. Temporary Diversion Structure at MH 48 Rev 4, 7. Micro-tunnelling Rev 2, 8. Temporary Diversion Structure at MH1 Rev 4, 9. Excavation and Blasting for Open Trench (pending approval).
- **Incident/Corrective Action Plans and Reports**: Section 30 Alarm Notification for vlei bank eroded due to burst water main (17-04-2025) and related Corrective Action Plan for repair and rehabilitation of 15m buffer zone eroded due to burst water main (29-04-2025) incl submission to DEA&DP, Corrective Action Plan for placement of pond in restricted area at MH 34, Incident Report for Effluent line rupture during excavation at Theo Marais Sport Field (14-02-2025)
- **Hazardous Substances Inventory**, CSV (in site file).
- **Noise Exemption Approval** issued by the City of Cape Town, 27-05-2025, viewed in the site file.
- **Appointment of Contractor's Environmental Officer (H Johnson)** (on site file)
- **Waste Disposal Register** (on site file) and waste manifest documents from Waste Mart (for collection of waste from CSV head office)
- **Hazardous Substances Inventory** (in site file)

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 construction 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.

N/A = Not Applicable = where a condition of the EA/EMPr is not currently applicable to the project (reason to be motivated) e.g. the phase of work.

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 site management but rather a general statement.

Partial Compliance = where a condition of the EA/EMPr has been complied with for the most part but minor additional management/administration action is required and recommended to gain full compliance.

The completed Compliance Checklist of findings follows:

3.2 Compliance Audit Findings:

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
A	COMPLIANCE WITH EA CONDITIONS					
1.	E.1	The holder is authorised to undertake the listed activities specified in EA Section B in accordance with and restricted to the Preferred Alternative in the BAR dated March 2022 on the site as described in Section C of the EA.	✓			No deviation or intention to deviate from the authorised activities per section B and C of the EA was observed or reported to the auditor, apart from the change applied for as detailed in audit item 4 below.
2.	E.2(a)	The holder must commence with the listed activities on site within a period of 5 years from the date of issue of the EA.	✓			Work on site commenced on 15 March 2023, which is within 5 years of issue of the EA (2022).
	E.2 (b)	The development must be concluded within ten years from the date of commencement of the first listed activity.	Noted			Construction has not yet been completed but is anticipated to be completed in 2025, well within the validity period of the EA (validity ending on 15 March 2033).
3.	E.3	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.	Noted			Noted.
4.	E.4	Any changes to, or deviations from the scope of the alternative described in section B of the EA must be approved in writing by the Competent Authority <u>before</u> such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	✓			An application for amendment of the EA was submitted on 25 February 2025 to allow a reduction of the 15m minimum buffer between the proposed pipeline and the Duikersvlei canal and associated wetland in the area between manhole 35 and 37, to allow continuation of construction due to unexpected ground conditions requiring an open trench and blasting (as opposed to the planned micro-tunnelling). Initially a part 2 amendment was requested by the DEA&DP but after further consultation with the EAP, a part 1 process was agreed to. By this time the 90-day period had almost lapsed, and the applicant was asked to resubmit, which was done in May. Receipt was acknowledged by the DEA&DP on 26-05-2025, with a part 1 amendment allowed (acknowledging no increased level or change in the nature of the impact related to the scope change). Approval was pending at the time of the audit , which has been problematic for the project and contributed to the non-compliance of EA condition 19 of the EA, as discussed in audit item 19.

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
						<p>RECOMMENDATION:</p> <p>a) Gain approval for the EA amendment allowing a selective reduction of the 15m buffer to the Duikersvlei canal before continuing with work in the area.</p> <p>(POST AUDIT UPDATE: The approval /amended EA was received on 25 June 2025, closing out this recommendation)</p>
5.	E.5	<p>A minimum of seven (7) calendar days' notice, in writing, must be given to the Competent Authority before commencement of development activities.</p> <p>6.1. The notice must make clear reference to the site details and EIA Reference number given.</p> <p>6.2. The notice must also include proof of compliance with the following conditions described in the EA: Conditions: 6,7 and 10.</p>	✓			<p>As confirmed by the Notification of Commencement submitted by Infinity to the DEA&DP on 24 February 2023, which was submitted more than 7 days prior to commencement of construction on site (15 March 2023).</p> <p>The notice included the required details in 6.1 and the proof of compliance required for EA conditions 6,7 and 8.</p>
6.	E.6	<p>The holder must in writing, within fourteen (14) calendar days of the date of this decision, notify all registered Interested and Affected Parties ("I&APs") of –</p> <p>6.1.1. the outcome of the application; 6.1.2. the reasons for the decision as included in (EA) Annexure 3; 6.1.3. the date of the decision; and 6.1.4. the date when the decision was issued.</p> <p>7.2. Draw the attention of all registered I&AP's to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G of the EA;</p> <p>7.3 draw the attention of all registered I&APs to the manner in which they may access the decision;</p> <p>Provide the registered I&APs with: 6.4.1. the name of the holder (entity) of this Environmental Authorisation, 6.4.2. name of the responsible person for this Environmental Authorisation, 6.4.3. postal address of the holder, 6.4.4. telephonic and fax details of the holder, 6.4.5. e-mail address, if any, of the holder, 6.4.6. the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).</p>	✓			<p>As confirmed in the Notification of Commencement and attached proof of notification of the I&AP's by Infinity on 27 June 2022 (5 days after the EA was issued on 22 June 2022). No appeals were lodged.</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
7.	E.7	The listed activities, including site preparation, must not commence within 20 calendar days from the date the holder notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.	✓			Commencement of construction on site was on 15 March 2023, which is outside of the appeal window (20 days after submission of notification of authorisation and right to appeal sent to I&AP's on 27 June 2022).
8.	E.8	The draft Environmental Management Programme ("EMPr") (dated March 2022) and submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.	✓			Yes, as monitored and reported on in the monthly ECO reports. <i>(Note that the ECO amended the EMPr in May 2025, with additional management actions specified, as discussed in section 4 of this audit report.)</i>
9.	E.9	The EMPr must be included in all contract documentation for all phases of implementation.	✓			As previously confirmed by the client representative, Nicol Jordaan of Bigen and the ECO in e-mails dated 12 June 2023 with clause extracts provided. Allowance was made in the Bill of Quantities for "Cost of Construction Environmental Management Programme", so the Contractor will be paid for adherence to the EMP.
10.	E.10	The holder must appoint a suitably experienced environmental control officer ("ECO") before commencing with development activity to ensure compliance with the EMPr and the conditions contained in the EA.	✓			The appointed ECO is still Infinity, as originally verified in the Notification of Construction Commencement submitted to the DEA&DP by Infinity on 24 February 2023 and the Confirmation of Appointment as Environmental Control Officer, by Infinity to Bigen on 20 July 2022.
11.	E.11	A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the office of the EA holder of the authorised listed activities and must be made available to any authorised person on request.	✓			Confirmed at the site office in the environmental management file of the Principal Contractor by the auditor on 2 June 2025 and are available for inspection. <u>Records kept at the office of the EA Holder (City of Cape Town) was not verified.</u>
12.	E.12	Access to the site referred to in Section C of the EA must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	✓			An inspection by the Competent Authority was reported undertaken in 2023 (after submission of the 2023 external audit report).

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
13.	E.13	<p>In terms of Regulation 34 of the EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Reports must be prepared by an independent person and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).</p> <p>13.1. The holder must undertake an environmental audit within three (3) months of the commencement of the listed activities and submit an Environmental Audit Report to the Competent Authority within one (1) month of completion of the environmental audit.</p> <p>13.2. Thereafter, the holder must undertake an environmental audit every two (2) years during the construction period and submit the Environmental Audit Reports to the Competent Authority one (1) month after the completion of undertaking each of the environmental audits.</p> <p>13.3. A final Environmental Audit Report must be submitted to the Competent Authority within one (1) year after the completion of the development phase.</p> <p>13.4. The holder must, within 7 (seven) days of the submission of the Environmental Audit Report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request.</p>	✓			<p>Confirmed by this audit report submitted in compliance of EA condition 13.2, by external auditor Christine Rabie. This audit report complies with the content requirements of Appendix 7 of the NEMA EIA regulations, as confirmed in section 1.2.1 of this report.</p> <p>This audit was conducted within 2 years of the previous audit (June 2023) and the report has been submitted within one month of completion of the audit (due by latest 2 July 2025).</p> <p>NB NOTE: It is the responsibility of the EA holder or their agents (not the auditor) to notify all potential and registered I&APs of the submission of this audit report within 7 days of issue to the DEA&DP and make the report available to anyone on request.</p>
14.	E. 14	<p>Should any heritage resources be discovered during the execution of the activities above, all works must be stopped immediately and the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape must be notified without delay. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil bones and fossil shells); coins; indigenous and/ or colonial ceramics; any articles of value or antiquity; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.</p>	n/a			<p>No heritage resources have been discovered by the construction team to date. (Pers. comm with the ECO and DEO, and per the issued ECO reports June 2023 – May 2025).</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
15.	E.15	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate. Uncontaminated building rubble generated on the premises can be used as back-filling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited in the recreated wetland area.	✓			Waste is removed from site to the Contractor's head office (as recorded in the Waste Register (viewed on the site file). At the head office, waste (including from other sources/sites) is sorted (incl. for recycling) and removed by specialist service provider Waste Mart. Waste Manifests from Waste Mart were viewed in the site file verifying safe disposal. No refuse or rubble was observed near the wetland area.
16.	E.16	Surface, storm or ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.		X		Four accidental incidents related to water pollution were recorded: 1. tunnelling into a treated effluent line at Theo Marais/Koeberg Road leading to a treated effluent spill into and the canal (5-10-2023), 2. Soil erosion leading to sedimentation of the stormwater drainage line adjacent to manhole 26 (23-09-2024), 3. Discharge of treated effluent line at the Marias Sports Field (14-02-2025) and 4. Rupture in the watermain near manhole 34-35 leading to bank erosion and sedimentation of the Duikersvlei Canal (17-04-2025). These incidents were accidental and have been rectified/the areas stabilised/made safe. A Water Use Licence has been issued by the Department of Water and Sanitation for this project (Licence no. 01/G21F/CI/12444) and is kept on the site file.
17.	E.17	The recommendations provided in the Geotechnical Investigation (compiled by SRK Consulting and dated January 2022), as included in the EMPr, must be implemented.	-			Refer to compliance audit of the EMPr specifications.
18.	E.18	The recommendations provided in the Aquatic Ecosystem Delineation and Risk Assessment (compiled by BlueScience and dated August 2021), as included in the EMPr, must be implemented.	-			Refer to compliance audit of the EMPr specifications.

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
19.	E.19	A minimum buffer of approximately 15m between the proposed pipeline and the Duikers Canal and associated wetland must be maintained during all phases of the proposed development. The buffer must be adequately demarcated prior to the commencement of the development activities within the Duikers Canal and associated wetland area.		X		During excavation for the installation of the new pipeline adjacent to the Duikersvlei Canal/wetland, geotechnical challenges due to the presence of rock necessitated that an open excavation approach including blasting, with a bigger disturbance footprint than micro tunnelling had to be pursued. This means that the 15-meter buffer cannot be practically maintained between manhole 35 and 37 on the pipeline. Application was made to the DEA&DP for relaxation of this requirement in the affected area - see audit item 4 for more details. A water main was damaged by works in the same area on 17-04-2025 resulting in a release of potable water into, and erosion of, the Duikersvlei canal bank and sedimentation into the canal. A Section 30 Alarm followed by a Corrective Action Plan was issued by the ECO to the DEA&DP. In addition, an encroachment of the buffer zone with stockpiled material was recorded on 29-11-2024.
20.	E.20	The recommendations provided in the Botanical Assessment (compiled by KC Phyto Enterprises CC and dated 24 November 2021 and revised 07 December 2021), as included in the EMPr, must be implemented.	-			Refer to compliance audit of the EMPr specifications.
21.	E.21	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	✓			The client representative, Nicol Jordaan of Bigen, confirmed in an e-mail dated 12 June 2023 that there is a specified minimum targeted labour contract participation goal (CPGL) of 0.3%. The Contractor needs to submit monthly labour reports in this regard. There is an appointed CLO.

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
B	COMPLIANCE WITH OUTCOMES OF THE EMPr section 4: Construction Environmental Management Plan					
<p>NOTE: EMPr required <u>Outcomes/Objectives</u> are highlighted in bold text under the specification section, followed by <u>Actions/Methods</u> which are indicated as bullet points. It is noted that this audit section is principally concerned with the development's compliance in achieving the required EMPr Outcomes/Objectives. It is noted that actions/methods set out 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 DEA&DP approval process.</p>						
GENERAL MANAGEMENT & ADMINISTRATION						
1.	EMP 3.2/ 5.1	<p>ECO appointed for duration of construction phase, incl. responsible for:</p> <ul style="list-style-type: none"> - periodic audits, - meet on site with the Contractor prior to construction to confirm designated development and the section of indigenous vegetation in the sensitive area which will not be cleared or removed and to confirm the method statements required - Request and review method statements - Ensure that the contractors and sub-contractors and their employees have received the appropriate environmental awareness training. - Keep a register of monitoring activities and results - 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. – <i>only due after construction completion</i>) 				<p>The ECO visits the site minimum monthly to audit compliance with the provisions of the EMPr and make recommendation for improvements if necessary – as evidenced by ECO June 2023 – May 2025 for this audit period.</p> <p>The ECO has requested, reviewed (and provided copy to the auditor of) environmental method statements approved since the previous audit.</p> <p>The ECO initially briefed the contractor management staff regarding environmental management – as confirmed during the previous audit.</p> <p>The ECO has identified additional management actions to be included in the EMPr – as discussed in section 4 of this report.</p>
2.	EMP 3.3/ 5.2	<p>Contractor to ensure:</p> <ul style="list-style-type: none"> - Ensure that all employees (permanent and temporary) and all sub-contractors 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. 				<p>The Contractor is conducting environmental inductions – as verified by the training attendance register viewed in the environmental site file.</p> <p>An environmental officer, Hilton Johnstone, has been appointed as part of the Contractor's team on site. As verified by the appointment letter in the environmental site file.</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN						
3.	EMP 4.1	<p>Prevention of pollution of wetlands</p> <ul style="list-style-type: none"> - 4.1.1 Manholes placed within 30 m of the aquatic features are sealed to minimize spills. - 4.1.2 No stockpiling of material within the buffer area. - 4.1.3 Construction works should preferably take place in the drier months of the year. If this is not possible adequate measures are in place to prevent materials and contaminated runoff from the construction works from washing into the wetland area. Works undertaken under the guidance of an Environmental Control Officer to ensure good housekeeping measures are in place. - 4.1.4 All waste materials associated with construction activities are removed from the area after the construction phase is complete. - 4.1.5 Where applicable, clearing of invasive alien plants within the construction area is undertaken during construction activities. - 4.1.6 Contractor method statement in place detailing how sewer spills during the construction phase will be contained, managed and how the receiving environment will be remediated. - 4.1.7 Contractor method statement in place for the control of erosion and sedimentation <p>Per EMPr additions 2023:</p> <ul style="list-style-type: none"> - Temporary Diversion at Theo Marais Canal per specification - Fuel driven portable equipment placed on drip trays - No Hazardous Chemical Substances (HCS) stored within 30 meters of the wetland (or other water courses or canals) on site. - A petrochemicals spill kit retained on site - Portable toilets not placed within 30 meters of the wetland (or other water courses or canals) on site. 			✓	<p>Work in the vicinity of the wetlands and near to the canal at the Theo Marais Sports Complex was in progress.</p> <p>No stockpiling was observed within the buffer area of the Theo Marais Canal at the time of the audit inspection, and the buffer was well demarcated with fencing. However, two incidents of incursion into the Duikersvlei buffer zone were recorded during this audit period: 1. Stockpiling and excavation of a temporary dam in buffer at MH 34 (29-11-2024) and excavation and damage to a water main between manhole 34 and 35 (17-04-2025) – hence a partial compliance is indicated.</p> <p>Silt screens have been installed to protect the temporary diversion structure at manhole 52 near to the Theo Marias canal (per additional specification included in the EMP revised in May 2023), stormwater channel art MH 26 and adjacent to the Duikersvlei canal.</p> <p>No problematic waste affecting wetlands/canals was recorded in the ECO reports or during the site visit.</p> <p>Any required alien clearing not forming part of site clearing operations will likely be undertaken only on completion of works.</p> <p>A section has been added to the Emergency Management Preparedness & Response MS to include methods detailing how sewer spills will be contained, managed and how the receiving environment will be remediated, as was recommended in the previous external audit report. The Contractor has prepared and submitted the Method Statement for Control of Erosion and Sedimentation prior to works being undertaken close to the Duikersvlei wetlands, as recommended by the previous external audit report.</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
						<p>No issues related to HCS or toilets placed within 30m of wetland were recorded. Petrochemical spill kit was confirmed on site by the ECO reports.</p> <p>RECOMMENDATION:</p> <p>b) Implement the Corrective Action Plan for bank repair and encroachment into the buffer, including the proposed seeding of stabilising vegetation. The ECO shall confirm satisfactory repair prior to contract completion.</p>
4.	EMP 4.2	<p>Prevent loss of conservation-worthy vegetation</p> <ul style="list-style-type: none"> 4.3.1 Prior to construction, the amount of indigenous vegetation to be cleared from the sensitive area indicated in Figure 1 of the EMP must be determined. The remaining section containing indigenous vegetation which will not be cleared to be fenced as confirmed in consultation with the ECO and Engineer. Fencing must be durable, visible, and maintained for the duration of the contract. 	✓			<p>Fencing to protect the vegetation of the sensitive area is in place (refer to photo sheet).</p>
5.	EMP 4.3	<p>Prevent significant change to the ecological processes of the indigenous vegetation ecosystem on the site</p> <ul style="list-style-type: none"> 4.3.2 Implement erosion control measures during and post-construction, including silt fencing, which must be installed around the area where launch pits will be constructed. The silt fence to be constructed before vegetation clearing and in accordance with the following specifications: (i) Geotextile / bidim affixed to stakes installed at intervals of not more than three metres and to a height of at least 40 cm above ground, with at least 10 cm installed within a trench and backfilled. (ii) Runoff should pass through the bidim as diffuse flow, not beneath it. 	✓			<p>Indigenous vegetation clearing and protection is undertaken per an approved method statement and no issues were recorded. As discussed in audit item 4 above, the demarcation fencing for the sensitive vegetation area is installed/maintained.</p> <p>No surplus building material was observed in the area.</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
		<ul style="list-style-type: none"> - 4.3.3 All surplus building material is removed from the site after construction - 4.3.4 Method statement for the clearing of indigenous vegetation in place (includes information about the area where indigenous vegetation will not be removed and detail on the fencing of this section thereof.) 				
6.	EMP 4.4	<p>Avoid unnecessary noise generation</p> <p>Avoid causing a nuisance to adjacent landowners</p> <ul style="list-style-type: none"> - 4.4.1 All construction equipment utilised, and activities undertaken must be compliant with the Western Cape Noise Control Regulations, P.N. 200/2013. - 4.4.2 Restrict construction activities generating noise outputs of 85 dB (A) or more to the hours of 08h00 to 17h00 Mondays to Fridays, unless approval of the ECO obtained, and surrounding communities informed prior to the work taking place. - 4.4.3 No amplified music allowed on Site. The use of audio equipment not permitted unless the volume is kept sufficiently low to be unobtrusive. No sound amplification equipment on Site, unless in emergency situations. - 4.4.4 If excessive noise is expected on the boundary of the site, neighbouring businesses must be informed in writing and in advance of when the high noise levels will occur and for how long they will occur. - 4.4.5 If noise levels at the site boundary are excessively high (i.e., above 70 dBA during the day, as stipulated in SANS 10103 Table 2 for industrial districts), machinery must be fitted with silencers. - 4.4.6 The Contractor must post signage indicating contact details of the Contractor and/or ECO on the site to allow for reporting of complaints - 4.4.7 -11: Management actions for blasting 	✓			<p>Only one noise complaint is recorded in the Complaints Register (28-09-2023) regarding construction noise along Railway Road. A Noise Exemption Approval issued by the City of Cape Town is in place. No exceedance of specified working hours or noise limits was reported. Thus, this audit item is still seen as compliant.</p> <p>The Contractor's sign board with company name is prominently displayed on the site camp fence. Similarly construction plant and vehicles are also identified with the company name and logo. This would make it easy for potential complainants to identify the contractor responsible and be able to contact them to lodge a complaint.</p> <p>No blasting has taken place yet (pending approval of amendment to EA condition E.19)</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
7.	EMP 4.5	<p>Prevent wind erosion and resultant dust impacts on surrounding area</p> <ul style="list-style-type: none"> - 4.5.1 Micro-tunnelling where possible - 4.5.2 Dust generated from all activities related to the proposed construction activities comply with the National Dust Control Regulations (GN No. R. 827 of 1 November 2013) - 4.5.3 Movement of site personnel and machinery over exposed soil minimised particularly in proximity to high-use roads such as Montague Drive and Koeberg Road. - 4.5.4 Exposed surfaces stabilized (within 2 weeks) - 4.5.5 Works staged to minimise the area of disturbed ground at any given time - 4.5.6 Screening and/or temporary fencing to control the movement of sand on the site if necessary. - 4.5.7 Non-potable water used for short- term dust stabilisation. - 4.5.8 Excavation, handling, and transportation of erodible materials avoided under high wind conditions. - 4.5.9 Exposed sand stabilised if remains exposed for more than 2 weeks, planted with indigenous grass species when bulk earthworks are completed. - 4.5.10 Stockpiles of sand and stone stabilised - covered or sealed if dust generation is apparent. - 4.5.11 All vehicles transporting sand and spoil have tarpaulins covering their loads - 4.5.12 Off-road vehicle and plant movements within the site avoided as far as possible, strict speed limits enforced. 54r - 4.5.13 Dust fallout monitoring in terms of the National Dust Regulations, undertaken if the dust mitigation measures are not effective - 4.5.14 Should the need arise; the City's Air Quality Officer will call for the implementation of a Dust fall Monitoring Programme; the dust fall rates must prove compliance with the prescribed dust fall rates. 	✓			<p>The contractor has used micro-tunnelling where possible which reduces the disturbance footprint and dust generation potential.</p> <p>No dust issues were observed or reported for this reporting period. While there are some open sand areas disturbed by construction, no significant risks are currently identified since we are in the winter wet period.</p> <p>No additional stabilization requirements were identified during the audit.</p> <p>No dampening down of exposed areas with water was being undertaken nor deemed required.</p> <p>A method statement is in place (approved) for Air Emission Management (copy provided to the auditor during the previous audit).</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
		<ul style="list-style-type: none"> - 4.5.15 Should dust fall results show dust fall rates to be above permissible standards, the Dust Management Plan may need to be amended and submitted to the City's Air Quality Officer for review, approval and authorisation. - 4.5.16 The relevant sections of the City of Cape Town Air Quality Management By-law 7662: 2016 as amended must be implemented: (i) Section 4: Duty of care (Reasonable measures to prevent air pollution). (ii) Section 19 (Authorisation of open burning and burning of material). (iii) Section 25 Emission caused by open burning, and (iv) Section 26 (Dust Emissions) - 4.5.17 Site screening methods, if deemed necessary, may be implemented to minimise potential dust nuisances. - 4.5.18 Method statement for the management of dust during construction compiled. 				
8.	EMP 4.6	<p>Prevent increased traffic congestion particularly along high-use roads</p> <ul style="list-style-type: none"> - 4.6.1 Adherence to a Traffic Management Plan to minimise traffic congestion. - 4.6.2 Use of flag persons to direct traffic when construction vehicles are moving 	✓			No issues related to traffic management were reported, recorded in the site file, or observed on site.
9.	EMP 4.7	<p>Minimise visual disturbance</p> <ul style="list-style-type: none"> - 4.7.1 Manage stockpile and laydown areas for cleanliness and appearance. - 4.7.2 Roof and screen waste areas. - 4.7.3 Avoid unnecessary signage or advertisement on site. 	✓			<p>The site camp and laydown area (including waste storage area) are well fenced and screened with shade cloth and no unnecessary signage (apart from required safety and identification signage) was observed.</p> <p>No visual impact issues were observed on site.</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
10.	EMP 4.8	<p>Manage waste in accordance with legislation and best practice methods. Minimise the production of general waste Prevent pollution or contamination due to improper waste handling or storage on site.</p> <ul style="list-style-type: none"> - 4.8.1/11/12 Contractor has prepared and is implementing a waste management plan/method statement for the construction phase. - 4.8.2 Designate a waste management area, of hardstanding with a roof and sides or consist of separate bins and skips. - 4.8.3 Litter and construction waste collected on site by the end of each day. - 4.8.4 Food waste stored in bins or skips that are covered and cannot be accessed by flies or rodents. - 4.8.5 Waste separated into hazardous, general, and recyclable waste streams, with clearly designated bins and skips for each waste type. - 4.8.6 Hazardous wastes, including materials contaminated with oils and hydrocarbons, must be removed from site by a suitably licensed contractor and manifests provided. - 4.8.7 Other non-hazardous solid waste (e.g., refuse) to be disposed of at a licensed landfill. - 4.8.8 A suitable waste contractor appointed to collect waste from site on a regular basis for correct disposal. Proof of disposal (waybills or waste disposal slips) must be retained and kept on file for auditing purposes. - 4.8.9 If the volumes of waste stored exceed 80m³ for hazardous waste and/or 100m³ for general waste the National Environmental Management: Waste Act (NEM:WA) National Norms and Standards for the Storage of Waste in terms of Government Notice (GN) No. 926 of 29 November 2013 must be adhered to. - 4.8.10 All rubble and waste is to be removed from site regularly and completely removed from site at the end of the construction phase. 			X	<p>A Waste Management Method Statement (<i>Solid Waste Management, Wastewater Management and Hazardous Waste Management, Ref. CSV/EHS/MS004/002/004</i>) is in place (approved) and a copy was provided to the auditor.</p> <p>The Waste Management method statement was updated to address the handling and disposal site of bentonite contaminated substances as recommended in the previous external audit report.</p> <p>Waste bins were provided at the two site camp areas.</p> <p>No issues of exposed food waste was observed.</p> <p>Poor waste management/housekeeping related to waste management was noted at the Theo Marais work site. While it is appreciated that the contractor was busy sorting the waste in this area, it is not a well contained or controlled waste management area per requirements of EMPr 4.82 and requires improvement. Overfull bins/bags were also noted in other areas (refer to photo sheet).</p> <p>No hazardous waste has been reported.</p> <p>A Waste Disposal Register is maintained on the environmental site file. All waste is taken to the Contractor's head office where it is sorted and collected by service provider Waste Mart and waste manifests demonstrating safe disposal are provided (also viewed on file).</p> <p>RECOMMENDATION:</p> <p>c) Improve housekeeping/control of waste management at the Theo Marais site including consideration of more bins and skips as may be required.</p>

Item	EA/EMPr Ref	Specification	Compliance			Comments
			Yes	No	Part	
11.	EMP 4.9	<p>Comply with environmental legislation regarding the disposal of waste, including construction waste and spoil</p> <p>4.9.1 If offsite spoil will be required during the construction period, identify potential spoil sites at the commencement of construction and ensure that spoiling of material will comply with the NEMA and the National Environmental Management: Waste Act.</p>	n/a			No off-site spoiling of material was reported.

4 EMPr REVIEW

4.1 Scope of the EMPr review

This EMPr review is restricted to the section relevant to the current phase of the development, namely the construction phase as dealt with in section 4 of the EMPr.

4.2 Relevance/shortcomings of the EMPr

No amendments to the presented Outcomes of the EMPr are recommended by the auditor at this time, nor were these suggested by the project ECO or DEO.

However, the project ECO has recommended the inclusion of additional mitigation Management Actions considering the need for blasting to address rock exposed on the pipeline route in line with Regulation 36(1) of the EIA Regulations of 2014, as amended which states:

“Where an amendment is required to the impact management actions of an EMPr, such amendments may immediately be effected by the holder and reflected in the next environmental audit report submitted as contemplated in the environmental authorisation and regulation 34.”

Refer to section 4.3 of this report that follows for details regarding the amendments.

No additional Management Actions have been recommended by the auditor. The remainder of the construction phase specifications of the EMPr are deemed relevant and effective to manage the anticipated risks for the remainder of the construction contract, bar any new risks or impacts arising from unforeseen activities/situations.

4.3 Recommendations for EMPr amendment

The following EMPr amendments (additions) proposed by the ECO for immediate implementation and as included in the revised EMPr May 2025, are supported by the auditor. They are as follows:

EMPr 4.4 Noise and Vibration

4.4.7. In the event of rock blasting, the blast must be covered with a sufficient overburden of soft soil. The soil should be fine with no large rocks and boulders.

4.4.8. Blasting near the industrial and private structures will require zero fly rock. controlling fly rock, and ground vibration should be prioritised.

4.4.9. Neighbours must be notified in advance of blasting operations.

4.4.10. Monitoring of the blast operations by a suitably qualified person is recommended.

4.4.11. A dilapidation survey of all buildings along the route should be undertaken to enable confirmation of any changes due to blasting and excavations.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This construction phase audit of the EA/EMPr recorded compliance issues with **2 of the 21 conditions of the EA**, namely: E16: Pollution of surface and stormwater and E: 19: activities within the 15m buffer zone of the Duikersvlei canal and **2 outcomes of the EMPr**: 4.1: prevention of pollution of wetlands and 4.8: waste management best practice.

The following recommendations arose from the audit:

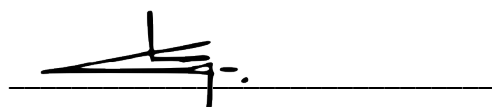
- a) Contractor to implement the Corrective Action Plan for bank repair and encroachment into the Duikersvlei buffer, including the proposed seeding of stabilising vegetation. The ECO shall confirm satisfactory repair prior to contract completion.
- b) EA Holder to gain approval for the EA amendment allowing a selective reduction of the 15m buffer to the Duikersvlei canal before continuing with work in the area. (POST AUDIT UPDATE: The approval /amended EA was received on 25 June 2025)
- c) Contractor to improve housekeeping/control of waste management at the Theo Marais site including consideration of more bins and skips as may be required.

The next external audit report required by the EA, will be due within one year of the completion of construction (anticipated by the end of year 2025).

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 7 days of issue to the DEA&DP and make the report available to anyone 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.

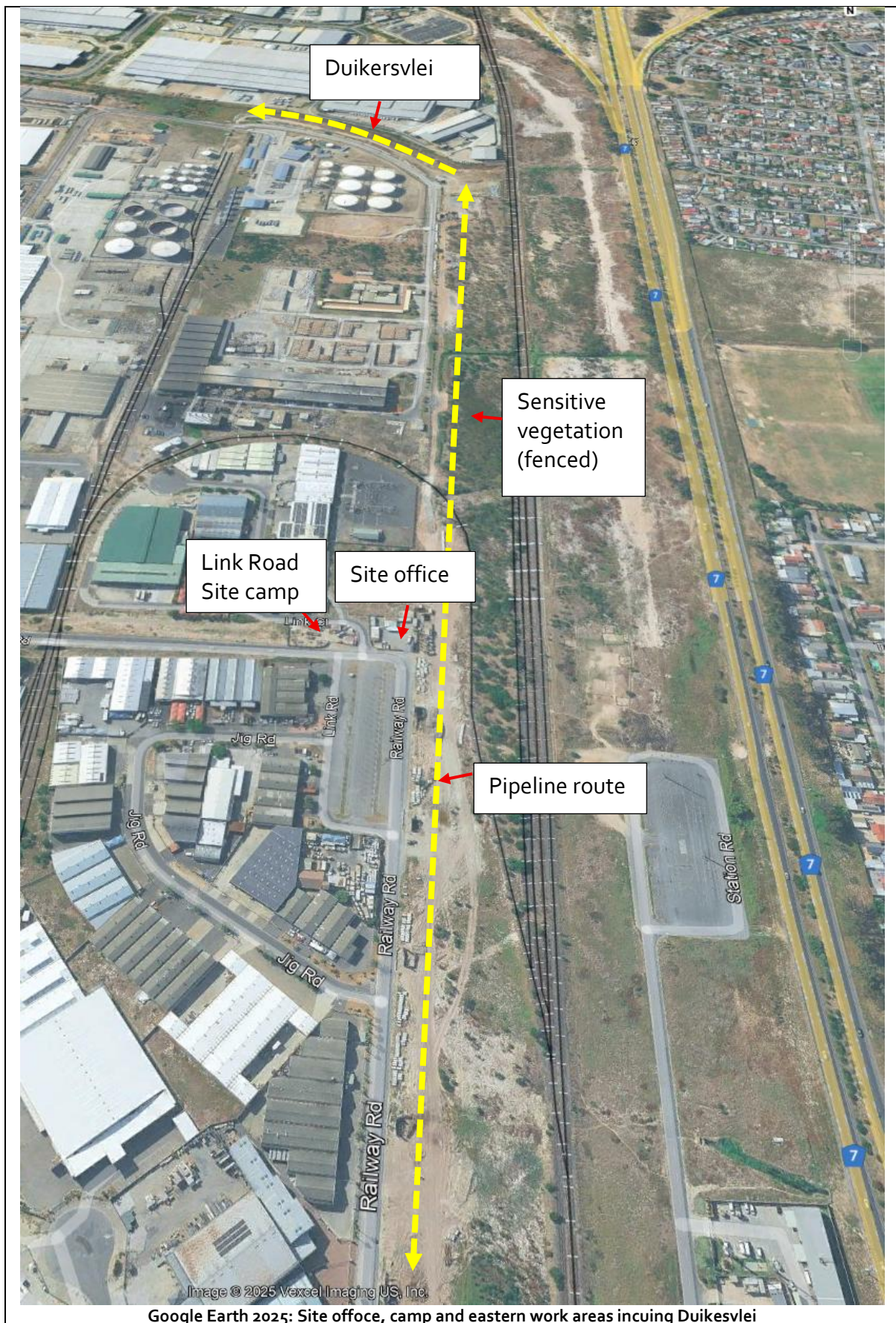


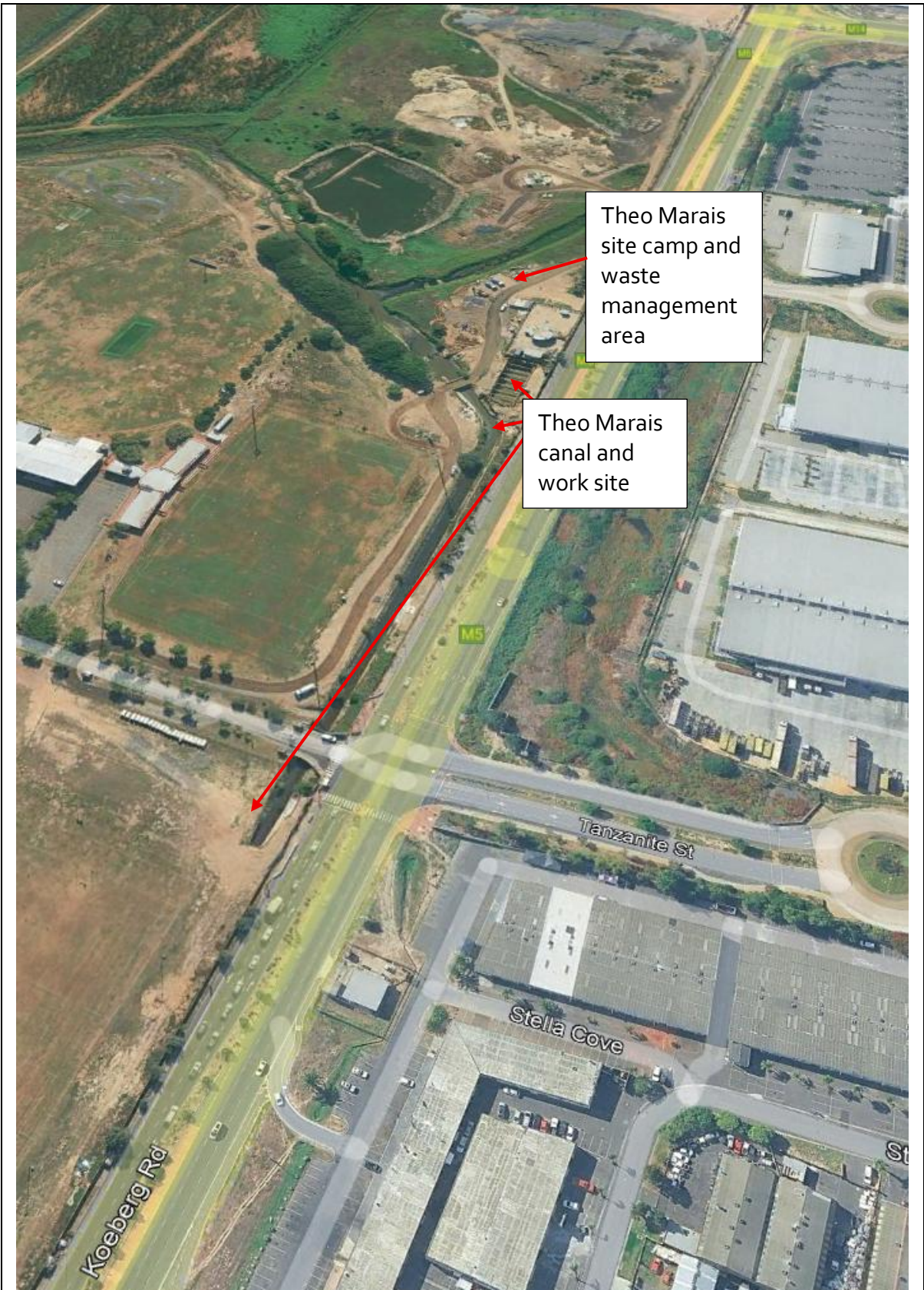
Signed by **Christine M.M Rabie** on **26 June 2025**

- 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
- 23 years of directly applicable EA and EMPr environmental compliance auditing experience.

7 APPENDICES:

7.1 AUDIT PHOTO SHEET





Western work area at Theo Marias Sport Complex and Kpeberg Road sewage pump station

EROSION/SEDIMENTATION CONTROL AND WATER COURSE PROTECTION



PHOTO 13: Silt screen between the works area and the Theo Marais Canal



PHOTO 14: Silt screen next to stormwater channel



PHOTO 15: Duikersvlei buffer fencing and silt screen



PHOTO 16: Open excavation for sewer line adjacent to Duikersvlei where planned micro-tunnelling is not possible



PHOTO 17: Damaged water main in the buffer zone that caused erosion on the bank of the Duikersvlei – awaiting imported parts for full repair



PHOTO 18: Eroded bank of the Duikersvlei in the location of the burst water main – will be repaired after pipe repair and seeded with stabilising vegetation

PETROCHEMICALS MANAGEMENT



PHOTO 19: Portable generators fitted with built-in drip trays



PHOTO 20: Secure petrochemicals storage in secure site container – with ventilation and spill trays

PROTECTION OF SENSITIVE AREAS



PHOTO 21: Demarcation of the sensitive indigenous vegetation adjacent to work site and access road

GENERAL



PHOTO 22: Work area along Railway Road – sheet piled launch pit and site toilet provided at key location



PHOTO 23: Work area demarcation at Theo Marias sports field and ground water dewatering in progress