
Environmental Management Audit - NEMA EIA Regulation 34 Audit – July 2026

Expansion of the Kuils River Cemetery

**Erven 1338, 1368 and 6282, Kuils River,
City of Cape Town, Western Cape**

DEA&DP reference	16/3/3/1/A8/74/3028/24
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Project phase	Construction phase; First audit
Prepared for	City of Cape Town
Report date	12 August 2026
Report status	Final Report

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Executive Summary

This report presents the findings of the first independent environmental audit undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014, as amended, for the authorised expansion of Kuils River Cemetery. The audit assessed compliance with the Environmental Authorisation and the applicable construction-phase requirements of the Environmental Management Programme from commencement of construction in November 2025 to the audit inspection on 1 July 2026.

Construction commenced under Triple C Maintenance and Services in November 2025. The site was temporarily closed at the end of March 2026 following termination of the former contractor's appointment, and construction resumed under WF Constructions at the end of May 2026. At the time of the audit, the works comprised civil construction, including earthworks, roads, drainage, kerbing and excavation of the new stormwater attenuation pond. Building construction and operational cemetery activities had not commenced and were excluded from the audit scope.

The audit considered environmental performance across the full audit period, including shortcomings recorded during the former-contractor period, the temporary site closure and performance under the current contractor. Historical shortcomings contributed to the compliance ratings where applicable. Findings were attributed so that inherited rubble, recovered waste and impacts associated with previous and ongoing informal occupation were not incorrectly attributed to the current contractor, WF Constructions.

Key findings

- Two Partial Compliance findings were recorded against the Environmental Authorisation, relating to the historical inconsistency in maintaining required environmental documents at the site office and the lack of full implementation of integrated waste-management best practice requirements.
- Four Partial Compliance findings were recorded against the EMPr, relating to lack of consistency in applying fuel- and oil-control measures, implementation of the Waste Management Plan, stockpile and dust controls, and site access and safety controls.
- No Non-Compliance findings, significant environmental damage or pollution incidents were identified.
- No significant erosion, dust nuisance, fuel or oil contamination, waste-related pollution, groundwater contamination or construction-related impact on the retained wetland was observed at the audit inspection.
- Historical recovered waste and inherited rubble remained awaiting removal but were contained and did not present an evident immediate pollution risk.
- One groundwater-monitoring well had a damaged concrete surround at the audit inspection; photographic evidence subsequently provided by the ECO confirmed that this was repaired on 15 July 2026. The prescribed groundwater-monitoring programme had not yet commenced.

Strengths observed

- Environmental performance at the audit inspection was generally satisfactory and showed a clear improvement under the current contractor.
- The active work areas were clean, orderly and stable.
- The environmental file was well organised and the principal environmental documents were available.
- Appropriate pollution-prevention controls were in place for sanitation, cement handling, spill response and relevant plant.

- The ECO provided active and professional oversight throughout the audit period, including identification and follow-up of corrective actions during both contractor periods.

Key recommendations

- Maintain the current EA, EMPr, ECO reports and audit report in the site environmental file.
- Provide suitable secondary containment for tack-coat drums.
- Implement the Waste Management Plan consistently, maintain separation of applicable waste streams and retain disposal or approved recycling or reuse records.
- Remove the inherited rubble and recovered waste to a licensed disposal site in accordance with the client's instruction.
- Maintain appropriate stockpile, dust, access and warning-signage controls.
- Commence the prescribed groundwater-monitoring programme under the supervision of the appointed hydrogeologist.

The February 2026 EMPr remains relevant and generally adequate to manage the environmental risks associated with the current construction works. The audit did not identify any new impact or risk that is not reasonably addressed by the EMPr, and no further amendment is recommended as a result of this audit. The February 2026 revision, which introduced Chapter 7, the Groundwater Monitoring Plan, is submitted to DEA&DP with this audit report as the record of the Revision 02 amendment in terms of Regulation 36(1).

Overall, the site was being managed to a satisfactory environmental standard at the time of the audit inspection, subject to completion of the identified actions. A final environmental audit report must be submitted within three months of completion of the construction works, and registered I&APs must be notified within seven calendar days after submission of this audit report to DEA&DP.

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Abbreviations	
DEA&DP	Department of Environmental Affairs and Development Planning
EA	Environmental Authorisation, Ref: 16/3/3/1/A8/74/3028/24, issued on 13 December 2024
ECO	Environmental Control Officer
EO	Environmental Officer designated by the Contractor
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme: Proposed Expansion of the Kuils River Cemetery on Erven 1338, 1368 and 6282, Cape Town, Western Cape, Infinity Environmental, August 2024; revised February 2026
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act (No 107) of 1998
MS	Environmental Method Statement

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): Current: WF Constructions; Former: Triple C Maintenance and Services
(Contractor's) Environmental Officer (EO): Cruishaun Peters assisted by Candice Olifant
EA Holder: City of Cape Town
Environmental Control Officer (ECO): Infinity Environmental, represented during the audit inspection by Kudakwashe Chimatira and Seemole Shika.

Evidence: Written records, physical evidence, audit observations and information provided during interviews or correspondence. Where practicable, information provided verbally was corroborated against documentary or physical evidence.

Engineer/client representative: Responsible for overseeing the contractual implementation of the works on behalf of the EA Holder, Bigen Group.

Site/Development: The authorised expansion of Kuils River Cemetery on Erven 1338, 1368 and 6282, Kuils River, including the construction activities and supporting infrastructure authorised by the EA.

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions was appointed on behalf of the Environmental Authorisation holder, the City of Cape Town, to undertake the first external environmental audit of the authorised expansion of Kuils River Cemetery. The audit was undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014, as amended, and assessed compliance with Environmental Authorisation Ref. 16/3/3/1/A8/74/3028/24, issued by the Department of Environmental Affairs and Development Planning on 13 December 2024, and the Environmental Management Programme, Rev 02 dated February 2026.

The authorised development comprises the expansion of the existing Kuils River Cemetery by approximately 2.5 hectares onto Erven 1338, 1368 and 6282, Kuils River. The development includes:

- eight burial blocks;
- new toilet facilities in the north-western portion of the site;
- a new parking area accommodating approximately ten vehicles;
- a guard house with controlled access;
- internal roads approximately 6.4 m wide, including roadside parking;
- three hearse roads approximately 3.2 m wide; and
- two new pedestrian footpaths approximately 2.5 m wide.

Access is provided from the existing cemetery parking area off Van Riebeeck Road and from the new northern access and parking area off Fabriek Street.



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

Construction commenced under Triple C Maintenance and Services during November 2025. The site was subsequently temporarily closed at the end of March 2026 following the termination of the former contractor's appointment, after which WF Constructions was appointed to continue the works, which resumed at the end of May 2026. At the time of the audit inspection on 1 July 2026, construction was limited to civil works, including earthworks, roads, drainage, kerbing and excavation of the new stormwater attenuation pond. Building works and operational cemetery activities had not commenced.

1.2 SCOPE AND TERMS OF REFERENCE

This audit and report fulfil the requirements for external environmental audits prescribed by Regulation 34 of the Environmental Impact Assessment Regulations, 2014, as amended, and Conditions E.16–E.19 of the Environmental Authorisation.

The audit assesses compliance with the conditions of the Environmental Authorisation and the applicable construction-phase requirements of the approved EMPr during the period from commencement of construction in November 2025 to the audit inspection on 1 July 2026.

The audit considers the environmental performance of both the former contractor, Triple C Maintenance and Services, and the current contractor, WF Constructions. Historical findings are distinguished from current contractor performance and from inherited site conditions.

The works under implementation at the time of the audit comprised civil construction only. Building works and operational cemetery activities had not commenced and are excluded from the scope of this audit.

1.2.1 EA requirements

Conditions E.16–E.19 of the EA require environmental audits to be undertaken in accordance with Regulation 34 of the EIA Regulations.

Condition E.17 requires:

- the first audit report to be submitted to the Competent Authority within six months of commencement of construction;
- a final audit report to be submitted within three months of completion of the construction works; and
- an environmental audit report to be submitted every five years while the Environmental Authorisation remains valid.

Condition E.18 requires the audit report to indicate compliance with the EA and EMPr and to make recommendations for improved environmental management.

Condition E.19 requires registered I&APs to be notified within seven calendar days after submission of the audit report to the Competent Authority. The report must be made available on request and placed on a publicly accessible website where such a facility exists.

1.2.2 NEMA EIA Regulation 34 Requirements

Regulation 34 of the EIA Regulations requires the holder of the Environmental 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 that an environmental audit report is submitted to the Competent Authority, in this case DEA&DP, at the intervals specified in the EA. The audit report must include the information prescribed in Appendix 7 of the 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 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 2.1
(3.1 h) summary and copies of any comments that were received during any consultation process; and	Not applicable
(3.1 i) any other information required by the competent authority.	EA Conditions 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 EA and approved EMPr and generate the audit checklist, review ECO monitoring reports, contractor environmental records, incident records and other

available project documentation relevant to the audit period, and prepare information requirements 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.

1.3 ASSUMPTIONS AND LIMITATIONS

The following assumption was made:

- Information provided by project personnel and consultants was assumed to be accurate and complete, unless contradicted by other available evidence.

Limitations to the audit are:

- The audit was undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014, as amended. It is not a comprehensive legal compliance audit of all environmental legislation. The assessment is limited to the conditions of the EA and the applicable construction-phase requirements of the EMPr.
- The audit period extends from commencement of construction activities in November 2025 to the audit inspection on 1 July 2026. The findings are based on conditions observed during the inspection and the available environmental performance records for the audit period.
- The site inspection represents conditions at a single point in time and cannot directly verify activities or incidents that were not observable or documented.
- The audit period included work undertaken by a former contractor, a temporary site-closure period and subsequent construction by the current contractor. Findings are attributed to the relevant period or contractor where the available evidence allows this distinction.
- The audit findings and conclusions are based on the auditor's observations and the information made available by project personnel. Wherever practicable, information was verified through documentary or physical evidence. The auditor cannot be held responsible for conclusions affected by inaccurate, incomplete or withheld information.

2 METHODOLOGY

2.1 Approach

The audit assessed compliance with the conditions of the Environmental Authorisation and the applicable construction-phase requirements of the approved Environmental Management Programme during the period from commencement of construction in November 2025 to the audit inspection on 1 July 2026.

The applicable EA conditions and EMPr requirements were incorporated into the audit checklists presented in Section 3. Compliance was assessed using the documentary evidence provided,

observations made during the site inspection and information obtained from the project environmental representatives. The site inspection was undertaken on 1 July 2026 by the independent environmental auditor, Christine Rabie. The inspection was attended by Kudakwashe Chimatira and Seemole Shika of Infinity Environmental and Candice Olifant, the Environmental Officer for WF Constructions.

The principal sources of information and audit evidence considered included:

- **Environmental Authorisation** Ref. 16/3/3/1/A8/74/3028/24, issued on 13 December 2024;
- **GEOSS Report December 2025**, confirming installation of Monitoring Wells MW1–MW3 and baseline field chemistry recorded at MW2;
- **Proof of notification of registered I&APs and organs of state**, 6 January 2025;
- **Department of Water and Sanitation** confirmation of registration of the project's Section 21(c) and 21(i) water uses under **General Authorisation, Ref. WU34817**.
- **Notification of commencement** dated 11 September 2025;
- **EMPr**, February 2026 revision;
- **ECO inspection and compliance reports** for the former-contractor (November 2025–February 2026) and current-contractor (May – June 2026) periods;
- **ECO Temporary site-closure checklist**, March 2026;
- **Environmental Method Statement register**;
- **Contractor's Waste Management Plan**;
- **Environmental induction and toolbox-talk attendance registers**;
- **Contractor acceptance of and commitment to comply with the EMPr**;
- **Site-file documentation** inspected during the audit;
- **Photographs and observations** recorded during the site inspection; and
- **Information provided by the ECO and Contractor's Environmental Officer**.

The audit checklists were completed following the site inspection and review of the available documentary evidence. Recommendations were made where corrective action, additional management control or improved record-keeping was required.

2.2 Assessment and Classification

Compliance was assessed against the specific requirement or environmental outcome established by each EA condition and applicable EMPr provision. The assessment considered the available objective evidence, including documented performance over the audit period and conditions observed during the audit inspection.

A procedural or administrative omission was not treated as substantive non-compliance of EMPr requirements where the required outcome had been met and the omission did not materially increase environmental risk, result in environmental harm or undermine the effectiveness of the applicable mitigation measure. Historical contractor shortcomings, inherited site conditions, corrected matters, current contractor performance and outstanding actions were distinguished wherever the evidence allowed. Legacy issues were not attributed to the current contractor.

Recommendations were included only where a specific corrective or improvement action remained necessary. As this was the first external environmental audit for the project, there were no findings from a previous Regulation 34 audit requiring close-out.

3 COMPLIANCE AUDIT

3.1 Compliance Checklist: Notes and key to compliance columns:

Compliant = The EA condition or EMPr requirement has been met. Where an impact was anticipated, the required controls were implemented and no material unmanaged environmental impact was identified.

Partially Compliant = The requirement has been met in part, but a specific outstanding action or control is still required to achieve full compliance. A missing supporting record alone does not warrant Partial Compliance where the required outcome is otherwise demonstrated by objective evidence.

Non-Compliant = The EA condition or EMPr requirement has not been met, or the failure materially increased environmental risk, resulted in environmental harm or undermined the effectiveness of the required mitigation.

Not Applicable = The condition or requirement does not apply to the project or the phase or activities assessed during the audit period.

Not Yet Required = The condition or requirement is applicable to the project but has not yet been triggered because the relevant project stage, event or submission point has not been reached.

Noted = The condition is informational, explanatory or establishes a responsibility that does not require a separate auditable action at the time of the audit.

3.2 Compliance Audit Findings

3.2.1 Compliance with the Conditions of the Environmental Authorisation

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
1.	The holder is authorised to undertake the Listed Activity specified in Section B of the EA in accordance with and restricted to the Preferred Activity Alternative described in Section B of the EA.	COMPLIANT	The construction activities observed during the audit were consistent with the authorised expansion of the Kuils River Cemetery and the approved development footprint. No unauthorised activities or material deviations from the authorised development were identified during the audit period.
2.	Authorisation of the Listed Activity is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure 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.	COMPLIANT	The City of Cape Town, as holder of the Environmental Authorisation, had established environmental management arrangements for the construction phase. Infinity Environmental was appointed as ECO, the contractor had designated an Environmental Officer, and compliance was monitored through regular ECO inspections and reports.
3.	The holder must commence with, and conclude, the Listed Activity within the stipulated validity period, which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the Competent Authority. This Environmental Authorisation is granted for – (a) A period of ten (10) years, from the date of issue, during which period the holder must commence with the authorised Listed Activity. (b) A period of ten (10) years, from the date the holder commenced with the authorised Listed Activity, during which period the authorised Listed Activity must be concluded.	COMPLIANT	Construction commenced within the validity period of the Environmental Authorisation. The construction phase remains within the authorised implementation period.
4.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including an implementing agent, sub-contractor, employee or any person rendering a service to the holder.	COMPLIANT	The holder established environmental oversight through the appointment of the ECO, incorporation of the EA and EMP requirements into the works, and monitoring of contractor performance.
5.	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 before such changes or deviations may be implemented. In assessing whether or not to grant such approval, 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	NOT APPLICABLE	No changes or deviations from the authorised project description were reported or identified during the audit period. The requirement to obtain approval for a deviation from the authorised project description was therefore not triggered.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
	holder to apply for further authorisation in terms of the applicable legislation.		
6.	A written notice of seven (7) calendar days must be given to the Competent Authority before the expansion work can be commenced with. 6.1. The notice must make clear reference to the site details and EIA Reference number given above. 6.2. The notice must include proof of compliance with the following conditions described herein: Conditions: 7, 8 and 13	COMPLIANT	The Competent Authority was notified on 11 September 2025 that construction would commence on or after 19 September 2025. The notification identified the project and EA reference, included proof of notification of registered I&APs and confirmed Infinity's appointment as the independent ECO. The requirements of this condition were met.
7.	The holder must in writing, within fourteen (14) calendar days of the date of this decision– 7.1. notify all registered Interested and Affected Parties (“I&APs”) of – 7.1.1. the decision reached on the application; 7.1.2. the reasons for the decision as included in Annexure 3; 7.1.3. the date of the decision; and 7.1.4. the date when the decision was issued. 7.2. draw the attention of all registered I&APs 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 below; 7.3. draw the attention of all registered I&APs to the manner in which they may access the decision; 7.4. provide the registered I&APs with the: 7.4.1. name of the holder (entity) of this Environmental Authorisation; 7.4.2. name of the responsible person for this Environmental Authorisation; 7.4.3. postal address of the holder; 7.4.4. telephonic and fax details of the holder; 7.4.5. e-mail address, if any, of the holder; and 7.4.6. 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 Appeals Regulations, 2014 (as amended).	COMPLIANT	Registered I&APs and organs of state were notified of the EA decision on 6 January 2025. In calculating the prescribed 14-calendar-day notification period, the period from 15 December to 5 January was excluded in terms of the EIA Regulations. The notification was therefore issued within the applicable timeframe and included the decision and issue date, access to the EA and reasons for the decision, details of the holder and responsible person, and information on the right and procedure to appeal.
8.	The Listed Activity, including site preparation, must not be commenced within twenty (20) calendar days from the date the applicant notifies the registered I&APs of this decision.	COMPLIANT	Physical construction commenced in November 2025, more than 20 calendar days after the I&AP notification dated 6 January 2025.
9.	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.	NOT APPLICABLE	No appeals were lodged against the Environmental Authorisation. This condition was therefore not applicable.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
10.	The Environmental Management Programme (“EMPr”) (dated August 2024), is hereby approved and must be implemented.	COMPLIANT	The EMPr was implemented through the contractor's environmental management system, approved method statements, environmental awareness training, regular ECO inspections and monthly monitoring reports reviewed during the audit period.
11.	An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.	NOT APPLICABLE	No amendment to an approved impact-management outcome was identified during the audit period. The requirement to obtain Competent Authority approval for an amendment to an EMPr outcome was therefore not triggered.
12.	The Environmental Authorisation and EMPr must be included in all contract documentation for all phases of implementation.	COMPLIANT	The environmental site file contained an Environmental Management Specification forming part of the contract documentation, together with the current contractor's signed acceptance of and commitment to comply with the EMPr. The EA and EMPr requirements were therefore incorporated into the current contractual arrangements.
13.	The holder must appoint a suitably experienced Environmental Control Officer (“ECO”) before the Listed Activity can be commenced with, to ensure compliance with the EMPr and the conditions contained herein. The ECO must submit ECO reports on a quarterly basis for the duration of the construction phase for the expansion activities being undertaken. The ECO must– 13.1. be appointed prior to commencement of any construction activities commencing; 13.2. ensure compliance with the EMPr and the conditions contained herein; 13.3. keep record of all activities on site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO; 13.4. remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed; 13.5. provide the competent authority with copies of the ECO reports within thirty (30) days of the project being finalised; and 13.6. conduct monthly site inspections during the construction phase.	COMPLIANT	Infinity Environmental was appointed as ECO before construction commenced. Monthly inspections were undertaken during active construction, with ECO reports recording activities, compliance issues, corrective actions and follow-up. Environmental oversight also continued during the temporary closure period through the closure checklist. The available records demonstrate that the ECO fulfilled the monitoring and reporting responsibilities required by this condition.
14.	A copy of the Environmental Authorisation, EMPr, ECO reports, audit reports and compliance monitoring reports must be kept at the contractor's site office during the construction phase for the expansion activities being undertaken and thereafter the said documents must be kept at the office of the holder and	PARTIALLY COMPLIANT	The required environmental documents were not consistently available at the contractor's site office throughout the audit period. The November 2025 report recorded that the EA and EMPr were initially absent but were subsequently placed at the site camp. The December 2025 report recorded that the EA, EMPr and

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
	must be made available to any authorised official of the Competent Authority on request.		November ECO report were not kept at the construction camp. In January 2026, the EA, EMPr and inspection reports were again unavailable, and the February 2026 report recorded that the November and December ECO reports were absent from the file. At the audit inspection on 1 July 2026, the environmental file was well organised and contained the EA, EMPr and available ECO reports. The historical record nevertheless demonstrates that the documents required by this condition were not consistently maintained at the site office during the audit period. Recommendation: a) Maintain the current EA, EMPr, ECO reports and this audit report in the environmental file at the contractor's site office for the remainder of construction.
15.	Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see the reports for the purposes of assessing and/or auditing compliance with the conditions contained herein.	NOTED	No request for access or production of environmental records by an authorised official was reported during the audit period. The obligation remains applicable should such a request be received.
16.	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. Environmental audit reports must be compiled and be submitted to the Competent Authority. Environmental audit reports must be prepared by an independent person with expertise and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).	COMPLIANT	This environmental audit was undertaken by an independent auditor with relevant environmental auditing expertise and assesses compliance with the EA and applicable construction-phase EMPr requirements. The report has been prepared to address the content requirements of Appendix 7 of the EIA Regulations, as demonstrated in Section 1.2.2 of this report.
17.	The audit reports must be compiled and subsequently submitted to the Competent Authority in the following manner: 17.1. An audit report must be submitted to the Competent Authority within six (6) months of the commencement of the construction work associated with the expansion; and 17.2. A final audit report must be submitted within three (3) months of the construction work associated with the expansion being completed. 17.3. The holder must submit an environmental	COMPLIANT	Construction commenced during November 2025 under the original contractor. Following termination of the contractor's appointment, construction activities were temporarily suspended pending appointment and mobilisation of a replacement contractor. The ECO confirmed during the audit interview that the first environmental audit was intentionally undertaken following recommencement of active construction under WF Constructions, as there were no active construction activities to

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
	audit report every five (5) years while the Environmental Authorisation remains valid.		audit during the temporary site closure. In the circumstances, the audit was undertaken at the earliest practical opportunity to meaningfully assess active construction-phase compliance and the condition is considered to have been met.
18.	The audit report must indicate compliance status with the conditions of this Environmental Authorisation, and the EMPr and make recommendations for improved environmental management.	COMPLIANT	This report records the compliance status of each applicable EA condition and construction-phase EMPr requirement and provides recommendations where further environmental management or corrective action is required.
19.	The holder must, within seven (7) calendar days of the submission of the audit report to the Competent Authority, notify all registered I&APs of the submission and make the audit report available to any registered I&AP on request and, where the holder has such a facility, place on a publicly accessible website.	NOT YET REQUIRED	This requirement is triggered following submission of the audit report to the Competent Authority and was not yet due at the time of the audit. The holder or EAP must notify registered I&APs within seven calendar days of submission, make the report available on request and place it on a publicly accessible website where such a facility exists.
20.	Surface or groundwater must not be polluted due to any actions on the site. The applicable requirements with respect to the relevant legislation pertaining to water must be met.	COMPLIANT	No surface-water or groundwater pollution was observed or reported during the audit period. Historical ECO reports recorded shortcomings in spill-response equipment, fuel-storage controls and cement handling during December 2025, January 2026, February 2026 and June 2026. These matters are assessed under the relevant EMPr requirements; no resulting pollution of surface water, groundwater or the retained wetland was identified. At the audit inspection on 1 July 2026, the active work areas were stable, spill-response equipment and a generator drip tray were available, and cement handling was protected. The project's section 21(c) and 21(i) water uses were registered by the Department of Water and Sanitation under General Authorisation Gazette Notice 49833, Ref. WU34817.
21.	Should any heritage remains be exposed during excavations or any other actions on the site, this must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include, inter alia, meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features	COMPLIANT	No archaeological, palaeontological or other heritage remains were observed or reported during the audit period. The chance-find procedure formed part of the environmental management controls and no circumstances arose requiring notification to Heritage Western Cape.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
	with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.		
22.	A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.	NOT APPLICABLE	No heritage remains requiring investigation or removal by a qualified heritage specialist were identified during the audit period. The requirement was therefore not triggered.
23.	An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste that cannot be recycled, re-use shall be disposed of at a licensed waste disposal facility.	PARTIALLY COMPLIANT	Integrated waste management was not consistently implemented during the audit period. The January, February, May and June 2026 ECO reports recorded mixed waste and inadequate separation of general, recyclable and other construction waste at source. The December 2025 ECO report recorded that waste-disposal slips or other evidence of disposal were not available for review, though this does not in itself demonstrate unlawful disposal. At the audit inspection on 1 July 2026, historical mixed waste stockpiles remained awaiting removal. These included inherited material and waste associated with previous informal occupation of the site and were not considered evidence of a current failure to separate waste at source. Recommendation: b) Maintain separation of applicable waste streams at the point of generation and retain relevant disposal or approved recycling or reuse records.
24.	Appropriate design measures and leak detection and containment measures must be in place during construction and operational phases to mitigate the risk of contaminating the aquifer.	COMPLIANT	No evidence of contamination of the aquifer was reported. Groundwater-monitoring wells have been installed. While historical shortcomings in fuel storage, spill-kit provision, drip trays and cement mixing were recorded by the ECO, no evidence was identified that these resulted in a material risk to the aquifer. At the audit inspection, the monitoring wells remained capped and protected and the principal pollution controls were in place.
25.	The following measures adapted from the final BAR (dated August 2024 and compiled by Mr. Jeremy Rose of Infinity Environmental (Pty) Ltd.), must be implemented: 25.1. The surface and subsoil drainage must be designed to maintain	COMPLIANT	The required groundwater, wetland and stormwater-management measures had been incorporated into the project design and environmental controls. The revised February 2026 EMPr includes a dedicated Groundwater Monitoring Plan, and groundwater-

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
	groundwater levels below 2m depth; 25.2. A 15m buffer around the wetland on the existing Kuils River cemetery must be implemented during construction and operational phase. No burials are permitted within the delineated wetland area; 25.3. No construction activities should occur within 50m of the depression wetland on the existing cemetery (as a precautionary measure); 25.4. All major construction earthworks within 50m of the attenuation pond should be conducted in summer to ensure stabilization of the hydrological functionality of the pond; and 25.5. A new stormwater attenuation fourth pond should be installed in the northwestern corner of the site and be aligned with the City of Cape Town's Water Sensitive Urban Design (WSUDS) criteria, to effectively protect downstream ecosystems.		monitoring wells have been installed. The prescribed wetland buffer and 50 m construction exclusion were maintained, with no construction-related impact on the depression wetland observed. The new stormwater attenuation pond was located in the northwestern portion of the site in accordance with this condition, the construction of which was in progress at the time of the audit.

3.2.2 Compliance with the Requirements of the Environmental Management Programme

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
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 of the related <u>Actions/Methods</u> as set out in the EMPr (not all listed in detail 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 DEA&DP approval process.				
GENERAL MANAGEMENT & ADMINISTRATION				
1.	EMP 3.2/ 6.1	ECO appointed for the duration of the construction phase, including responsibility for: - periodic inspections and compliance records; - confirming development and no-go areas before construction; - requesting and approving Method Statements; - providing environmental awareness training to contractor management; - identifying corrective actions and updating the EMPr where required; and - undertaking the final inspection and close-out report after construction.	COMPLIANT	Infinity Environmental was appointed as ECO for the construction phase. ECO inspections were undertaken during active construction, generally on a monthly basis, and the available reports record site activities, compliance findings, corrective actions and follow-up. The ECO reviewed and approved environmental method statements and provided environmental awareness training to the management personnel of both contractors. The final inspection and close-out reporting obligations have not yet been triggered because construction is ongoing.
2.	EMP 3.3/ 6.2	Contractor to ensure: 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.	COMPLIANT	Environmental awareness training was provided to personnel employed by both the previous and current contractors. The previous contractor's training register dated 2 October 2025 and the current contractor's induction registers dated 26 May 2026 were provided for review. Contractor-led induction and toolbox-talk records were also available. Sine Sipho fulfilled the environmental representative role for Triple C, while Cruishaun Peters, the current contractor's SHE coordinator, is responsible for environmental oversight, assisted by Candice Olifant with daily oversight, toolbox talks and environmental administration.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
3.	3.5	Hydrogeologist appointed to conduct groundwater Experienced hydrogeologist appointed to: - Determine the location of the monitoring wells or boreholes. - Oversee establishment of the groundwater-monitoring network. - Establish baseline groundwater levels and quality before development. - Define the operational groundwater-monitoring parameters and frequencies.	COMPLIANT	GEOSS was appointed as the hydrogeological specialist and determined the monitoring-well locations and supervised the installation of three groundwater-monitoring wells during November 2025. MW1 and MW3 were dry at the time of drilling, while baseline groundwater levels and field water-quality readings were recorded at MW2. GEOSS also provided recommendations for the ongoing groundwater-monitoring programme.
CONSTRUCTION				
4.	4.1 Soil and groundwater contamination	Outcome: The wetland and buffer zone are not impacted negatively. - Recommended 15 m buffer zone for the wetland on Erf 1339 maintained. - Construction activities and materials located outside the wetland and buffer. - Activities monitored weekly and any encroachment or non-compliance recorded and reported.	COMPLIANT	The wetland and buffer zone were not negatively impacted. No construction activities were observed within the prescribed wetland buffer, and the active civil works remained outside the protected area. No encroachment, sedimentation, pollution or other construction-related impact on the wetland was observed or recorded during the audit period.

5.		Outcome: To control and eliminate fuel and oil spillages which may result in soil, surface water and groundwater contamination. • Pollution-control and containment measures implemented for fuels, oils and hazardous chemicals. • Vehicles and plant inspected for leaks and drip trays used where required. • Hazardous chemicals stored safely and appropriately. • Spill-response measures available and spills contained, cleaned up and recorded. • Contaminated material lawfully disposed of.	PARTIALLY COMPLIANT	Fuel and oil spillages were not consistently prevented through the required controls during the audit period, although no fuel- or oil-related contamination was reported. The December 2025 ECO report recorded that no spill kit was available. The January 2026 report recorded that drip trays and a spill kit had not been provided, that a clearly marked fuel-storage area was required, and that the chemical-storage area still needed to be established and equipped with containment. The February 2026 report confirmed that a chemical-storage area and spill-response kit had subsequently been provided, although fuel-dispensing and equipment-maintenance areas still required demarcation. Following appointment of the current contractor, the May 2026 ECO report recorded that drip trays, a spill kit and a clearly marked fuel-storage area were still required. The June 2026 report recorded an incomplete spill kit, insufficient drip-tray provision and the continued need for a clearly demarcated fuel-storage area. At the audit inspection on 1 July 2026, a spill kit was available and the generator was positioned over a drip tray. No fuel or oil leakage, staining or resulting contamination was observed. Liquid tack-coat drums were, however, stored without secondary containment. Recommendation: c) Place tack drums within suitable secondary containment.
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6.	4.2 Waste management	Outcome: Manage waste in accordance with legislation and best practice methods. • Construction-phase Waste Management Plan implemented. • Designated and demarcated waste-management area established with suitable bins or skips. • Hazardous, general and recyclable waste separated and clearly identified. • Hazardous and general waste stored under controlled conditions. • Applicable waste-storage thresholds and legal requirements complied with.	PARTIALLY COMPLIANT	Waste was not consistently managed in accordance with best-practice methods during the audit period. The absence of a formal Waste Management Plan was recorded by the ECO in November and December 2025; inadequate bins, skips, waste-area demarcation and separation at source were recorded in January, February, May and June 2026; and waste-disposal records were unavailable in December 2025. By the audit inspection on 1 July 2026, a current Waste Management Plan and designated waste-management area were in place. Historical mixed-waste stockpiles remained awaiting removal but included inherited material and waste from previous and ongoing informal occupation and were not treated as evidence of current poor separation at source. No hazardous waste was reported as having been generated, no waste-storage thresholds were identified as having been exceeded, and no evidence of unlawful waste disposal was identified. Recommendation: d) Implement the Waste Management Plan consistently, maintain separation of applicable waste streams at the point of generation, provide clearly identified bins or skips appropriate to the waste being generated, and retain relevant disposal or approved recycling or reuse records.
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7.		Outcome: Minimise the production of general waste. • Waste generation minimised through separation, reuse and recycling where practicable. • Waste removed regularly to prevent unnecessary accumulation. • Site kept free of avoidable litter and windblown waste.	COMPLIANT	The production of general waste was minimised. Low volumes of general waste were associated with the project construction activities. Litter recorded during the audit period was largely associated with the ongoing informal occupation of the site, although isolated construction-related litter, including cement bags within work areas, was also recorded and addressed through ECO corrective action. Historical waste was recovered and consolidated for removal. The separately stockpiled rubble and mixed material originated from the previous contractor, including rubble brought onto the site from another project, and from previous and ongoing informal occupation of the site. It therefore does not indicate excessive waste generation by the authorised construction works. The material remained stable and was awaiting removal in accordance with the client's instruction. Recommendation: e) Remove the inherited rubble and recovered waste to a licensed disposal site in accordance with the client's instruction and retain the applicable disposal records.
8.		Outcome: Prevent pollution or contamination due to improper waste handling or storage on site. • No hazardous waste stored within the wetland on Erf 1339 or its associated 15 m buffer. • Oil- and hydrocarbon-contaminated material removed by a licensed contractor. • Non-hazardous solid waste disposed of at a licensed landfill. • Waste-disposal slips or waybills retained for auditing. • Drip trays provided for equipment and generators that may require refuelling.	COMPLIANT	No pollution or contamination resulted from the handling or storage of waste on site. No waste was stored within the wetland or its associated buffer, and no litter dispersal, leakage, soil contamination or other pollution associated with waste storage was observed. General waste and recovered material were contained within designated areas. The historical absence of some waste-disposal records is addressed under Item 6 and was not considered sufficient to demonstrate improper disposal or failure to achieve this pollution-prevention outcome. Drip-tray and fuel-control shortcomings are assessed under Item 5.

9.	4.3 Dust, noise and fumes impacts	Outcome: Prevent or minimise wind erosion and dust impacts. • Dust-causing activities avoided under high-wind conditions where practicable. • Exposed soil and stockpiles stabilised, covered or otherwise controlled where dust generation is apparent. • Dust suppression implemented where required. • Vehicles transporting sand and spoil covered with tarpaulins. • Dust complaints recorded. • Dustfall monitoring undertaken where more than one dust complaint is registered. • Mitigation amended where permissible dustfall standards are exceeded.	PARTIALLY COMPLIANT	Wind erosion and dust impacts were effectively minimised. Wind erosion and dust impacts were not consistently prevented during the audit period. The November and December 2025 ECO reports repeatedly required stockpile heights to be reduced and stockpiles to be covered, stabilised or wetted to limit windblown dust. In December 2025, some stockpiles remained above the recommended height and were dry and susceptible to wind dispersion, although water spraying was being undertaken. At the audit inspection on 1 July 2026, no dust nuisance was evident, the active work areas and stockpiles were stable, and a water truck was available for dust suppression if required. No dust complaints were recorded, and the dust fall monitoring requirement had not been triggered. Recommendation: f) Maintain stockpiles at manageable heights and cover, stabilise or wet them where there is a risk of wind erosion or dust generation.
10.		Outcome: Avoid unnecessary noise and causing nuisance to adjacent landowners • Construction equipment and activities compliant with the Western Cape Noise Control Regulations. • Activities generating 85 dB(A) or more restricted to 08h00-17h00, Monday to Friday, unless approved by the ECO. • Surrounding communities informed before approved noisy work outside normal hours. • No amplified music permitted, except for emergency communication. • Neighbouring residents informed in advance where excessive noise is expected. • Machinery fitted with silencers where applicable boundary noise limits are exceeded. • Contractor and/or ECO contact details displayed for complaints. • Noise complaints recorded and investigated.	COMPLIANT	Construction noise was not reported or observed to have caused unnecessary nuisance to adjacent landowners. No excessive or unnecessary construction noise was observed during the audit inspection, and no noise complaints were identified in the supplied records. The works underway were normal civil construction activities and no evidence was found that noise controls or working-hour requirements had been breached.

11.		Outcome: Avoid or minimise the production of fumes during construction - Fuel-powered vehicles and machinery maintained in good condition. - Vehicles and machinery routinely serviced. - Excessive fumes or poorly maintained equipment identified and corrected.	COMPLIANT	No excessive production of fumes was observed or recorded. No excessive exhaust emissions, smoke or problematic fumes were observed during the audit inspection. The plant and vehicles viewed appeared to be in serviceable condition, and no fumes-related complaint or environmental incident was recorded.
12.	4.4 Traffic, safety and access	Outcome: Traffic is avoided or minimised. - Construction undertaken within working hours during the week. - Traffic marshal provided where heavy construction traffic may impede normal traffic flows. - Large, abnormal and hazardous-material loads appropriately routed. - Transport safety precautions implemented.	COMPLIANT	No negative traffic impacts or risk were recorded. Construction traffic was orderly and remained within the designated site routes and parking areas. No obstruction of normal traffic flow or conflict with public traffic was observed during the audit inspection, and no traffic-related complaint or incident was identified in the available records.

13.		Outcome: Safety on site is ensured and access to the site is controlled • Vehicles legally compliant and operated by appropriately licensed drivers. • Designated routes used and speed limits observed. • Warning signage erected near the site access where required. • No vehicle operated by a person under the influence of alcohol or narcotic substances. • Access to the construction area controlled.	PARTIALLY COMPLIANT	Site safety and access control were not consistently maintained throughout the audit period. During active construction, the site camp and temporary laydown area were fenced and secured, designated vehicle routes were used, and no unsafe vehicle operation or incident involving unlicensed or impaired drivers was reported. However, the temporary site-closure inspection on 31 March 2026 recorded that the site gate was unlocked, open excavations were neither adequately backfilled nor cordoned off, and members of the public were present near the unsecured access. Scattered construction materials also contributed to the identified safety risk. Warning signage at the site access was also repeatedly required in November and December 2025 and again in February, May and June 2026. At the audit inspection on 1 July 2026, active construction areas were controlled and no uncontrolled public access, unsafe vehicle operation or safety incident was observed. Recommendation: g) Maintain the site gate and construction areas securely controlled at all times, including during temporary work stoppages, and retain appropriate warning signage at the site access and hazardous work areas.
14.	4.5 Visual impacts	Outcome: Unnecessary visual disturbance is avoided • Stockpiles and site-camp areas appropriately located, demarcated and managed. • Site camp, storage areas and active works maintained in a clean and orderly condition. • Waste and litter appropriately managed. • Construction activities undertaken during working hours. • Unnecessary signage and advertising avoided.	COMPLIANT	No unnecessary visual disturbance was recorded. The wider construction area was generally clean and orderly, with the site camp and stockpiles located within the active civil-works area. Mixed recovered waste and inherited rubble remained awaiting removal, but these were localised and are addressed under the waste-management findings.

15.	7 Groundwater Monitoring Plan	Outcome: No groundwater contamination by wastewater or sanitation leaks • Temporary sanitation facilities sufficient, well maintained and regularly serviced. • Portable toilets located outside wetland-buffer areas and secured against overturning. • Spill-response kits and plans available and staff trained. • Boreholes sealed at the surface to prevent pollution ingress. • Visual inspections undertaken and sanitation-related leaks or incidents recorded.	COMPLIANT	No groundwater contamination from wastewater or sanitation leaks was recorded. No groundwater contamination from wastewater or sanitation leaks was recorded. Portable toilets were provided outside the wetland buffer and were generally maintained in a satisfactory condition. Instances where toilets required securing were recorded in May and June 2026, but no overturning, leakage or associated contamination occurred. A spill kit was available, and the groundwater-monitoring wells were capped to limit the ingress of surface pollution. The damaged concrete surround at one monitoring well required maintenance but did not compromise the sealed wellhead at the time of inspection. Recommendation: h) Repair the damaged concrete surround at the upstream monitoring well. Post-audit update: Photographic evidence provided by the ECO confirms that the concrete surround to the monitoring well was repaired on 15 July 2026. This recommendation is therefore considered closed out.
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16.		Outcome: No groundwater contamination by fuel and oil spills from construction vehicles • Oil traps or drip trays used beneath stationary machinery. • Refuelling undertaken at the fuelling station with spill-containment measures. • Fuel and oil spills immediately cleaned up and contaminated material disposed of at licensed sites. • Hazardous-material storage, handling and transport procedures implemented. • Vehicles and equipment maintained in good working order and operators appropriately trained. • Monitoring boreholes installed and commissioned downstream of potential contamination sources as required. • Specified groundwater-quality monitoring undertaken by the hydrogeologist.	COMPLIANT	No groundwater contamination from fuel or oil spills was recorded. No fuel or oil spill, associated soil contamination or groundwater contamination was recorded during the audit period. Shortcomings in preventative measures including fuel storage, spill-kit provision, drip trays and secondary containment of tack drums are assessed under Item 5 and are not duplicated here. Three groundwater-monitoring wells were installed in November 2025. MW1 and MW3 were dry at the time of installation, while groundwater was encountered at MW2. MW2 yielded water, but only baseline field chemistry was recorded: pH 7.2 and EC 226 mS/m. The requirement for biannual groundwater-quality monitoring was introduced through the revised Chapter 7 of the EMPr, effective from February 2026. The first six-month monitoring interval had therefore not yet elapsed by the audit inspection on 1 July 2026. Recommendation: i) Implement the prescribed biannual groundwater-monitoring programme under the supervision of the appointed hydrogeologist. The hydrogeologist must confirm the appropriate monitoring approach where individual wells remain dry and whether the existing network provides suitable monitoring points for detecting potential groundwater impacts.
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17.		Outcome: No groundwater contamination by wastewater or cementitious waste • Effluent and wastewater systems maintained in working order. • Spill-response kits and plans available and staff trained. • Boreholes sealed at the surface to prevent pollution ingress. • Cement and concrete mixed on an impermeable surface. • Cement-contaminated water directed away from wetlands and watercourses. • Batching runoff controlled and cement-contaminated water collected. • Contaminated water lawfully disposed of or reused in batching. • Empty cement bags stored in weatherproof containers. • Specified groundwater pH and EC monitoring undertaken.	COMPLIANT	No groundwater contamination from wastewater or cementitious waste was recorded. The February 2026 ECO inspection recorded one instance of cement being mixed directly on the soil. The affected material was subsequently collected and a protected mixing area was established. Cement and concrete were thereafter handled over an impermeable surface, and empty cement bags identified within work areas were removed through ECO corrective action. The quarterly groundwater pH and electrical-conductivity monitoring introduced through the February 2026 revision of Chapter 7 had not yet been undertaken by the audit inspection. This does not alter the compliance rating for the pollution-prevention outcome, but the prescribed monitoring programme should now be implemented. Recommendation: j) Undertake the prescribed quarterly groundwater pH and electrical-conductivity monitoring under the supervision of the appointed hydrogeologist, and continue using an impermeable surface for all cement and concrete mixing.
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4 EMPr REVIEW

4.1 Scope of the EMPr review

The EMPr review considered the February 2026 revised EMPr made available to the auditor and was limited to the requirements relevant to the current construction phase. This included the applicable general management, construction, environmental-awareness and groundwater-management requirements.

4.2 Relevance and effectiveness of the EMPr

The February 2026 EMPr remains relevant and generally adequate to manage the environmental risks associated with the current construction works. The compliance audit demonstrated that its outcomes and management measures provide appropriate controls for the principal construction-phase risks, including wetland protection, fuel and oil management, waste, dust, noise, traffic and access, visual impacts and groundwater protection.

The audit did not identify any new environmental impact or risk that is not reasonably addressed by the EMPr. The partial-compliance findings primarily resulted from inconsistent implementation of existing requirements rather than shortcomings in the content of the EMPr.

Chapter 7 provides additional groundwater-protection and monitoring measures applicable during construction and operation. The monitoring requirements are relevant given the shallow and sensitive groundwater conditions identified for the site. The ongoing monitoring programme should be implemented under the direction of the appointed hydrogeologist as prescribed.

4.3 EMPr amendment

The February 2026 EMPr incorporates a new Chapter 7 Groundwater Monitoring Plan. The revision record identifies this as Revision 02, effective from February 2026. The ECO confirmed that the revised EMPr had not yet been submitted to DEA&DP.

The additional groundwater-management provisions comprise impact-management and monitoring actions supporting the existing groundwater-protection outcomes. No amendment to an approved impact-management outcome was identified. In terms of Regulation 36(1) of the EIA Regulations, 2014, as amended, amendments to impact-management actions may be implemented by the holder immediately and must be reflected in the next environmental audit report required in terms of Regulation 34. The February 2026 revised EMPr is therefore submitted to DEA&DP together with this environmental audit report as a record of the Revision 02 amendment.

No further amendment to the EMPr is recommended as a result of this audit.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This first construction-phase audit assessed compliance with the Environmental Authorisation and applicable construction-phase requirements of the Environmental Management Programme from commencement of construction in November 2025 to the audit inspection on 1 July 2026. The audit period included work by the former contractor, a temporary site-closure period and subsequent construction under the current contractor.

The audit recorded:

- **Two Partial Compliance findings against the Environmental Authorisation**, relating to the historical availability of required environmental documents at the contractor's site office and inconsistent implementation of integrated waste-management requirements.
- **Four Partial Compliance findings against the EMPr**, relating to fuel- and oil-control measures, implementation of the Waste Management Plan, historical stockpile and dust controls, and site access and safety controls.
- **No Non-Compliance findings.**
- **No significant environmental damage or pollution incidents.**

Environmental performance at the audit inspection was generally satisfactory and represented a clear improvement from the former-contractor period. The active works were clean, orderly and stable, the environmental file was well organised, and the principal pollution-prevention controls were in place. No significant erosion, dust nuisance, fuel or oil contamination, waste-related pollution, groundwater contamination or construction-related impact on the retained wetland was observed.

Historical shortcomings, inherited waste and conditions associated with previous and ongoing informal occupation were distinguished from the current contractor's performance. Several matters identified through the ECO monitoring process had been corrected by the audit inspection. The remaining actions relate principally to maintaining the improved controls, completing removal of accumulated inherited waste material, providing secondary containment for tack-coat drums, maintaining secure access and implementing the prescribed groundwater-monitoring programme.

The February 2026 EMPr remains relevant and generally adequate to manage the environmental risks associated with the current construction works. No new environmental impact or risk requiring additional management measures was identified, and no further amendment to the EMPr is recommended as a result of this audit. The February 2026 EMPr incorporates a new Chapter 7 Groundwater Monitoring Plan. In terms of Regulation 36(1) of the EIA Regulations, the revised EMPr is submitted to DEA&DP together with this audit report as the record of the Revision 02 amendment.

The following recommendations arose from the audit:

Environmental documentation

a. Maintain the current EA, EMPr, ECO reports and this audit report in the environmental file at the contractor's site office for the remainder of construction.

Fuel and oil management

b. Place tack drums within suitable secondary containment.

Waste management

c. Maintain separation of applicable waste streams at the point of generation and retain relevant disposal or approved recycling or reuse records.

d. Implement the Waste Management Plan consistently, maintain separation of applicable waste streams at the point of generation, provide clearly identified bins or skips appropriate to the waste being generated, and retain relevant disposal or approved recycling or reuse records.

e. Remove the inherited rubble and recovered waste to a licensed disposal site in accordance with the client's instruction and retain the applicable disposal records.

Dust management

f. Maintain stockpiles at manageable heights and cover, stabilise or wet them where there is a risk of wind erosion or dust generation.

Access and safety controls

g. Maintain the site gate and construction areas securely controlled at all times, including during temporary work stoppages, and retain appropriate warning signage at the site access and hazardous work areas.

Groundwater protection and monitoring

h. Repair the damaged concrete surround at the upstream monitoring well. **Post-audit status: Closed out.** Photographic evidence provided by the ECO confirms that the repair was completed on 15 July 2026.

i. Implement the prescribed biannual groundwater-monitoring programme under the supervision of the appointed hydrogeologist. The hydrogeologist must confirm the appropriate monitoring approach where individual wells remain dry and whether the existing network provides suitable monitoring points for detecting potential groundwater impacts.

j. Undertake the prescribed quarterly groundwater pH and electrical-conductivity monitoring under the supervision of the appointed hydrogeologist, and continue using an impermeable surface for all cement and concrete mixing.

Other requirements

The final environmental audit report must be submitted to DEA&DP within three months of completion of the construction works. An environmental audit report must thereafter be submitted every five years while the Environmental Authorisation remains valid.

The EA holder must, within seven calendar days after submission of this audit report to DEA&DP, notify all registered I&APs of the submission, make the report available on request and place it on a publicly accessible website where such a facility exists.

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 12 August 2026**

- 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.
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7 APPENDICES

7.1 AUDIT PHOTO SHEET

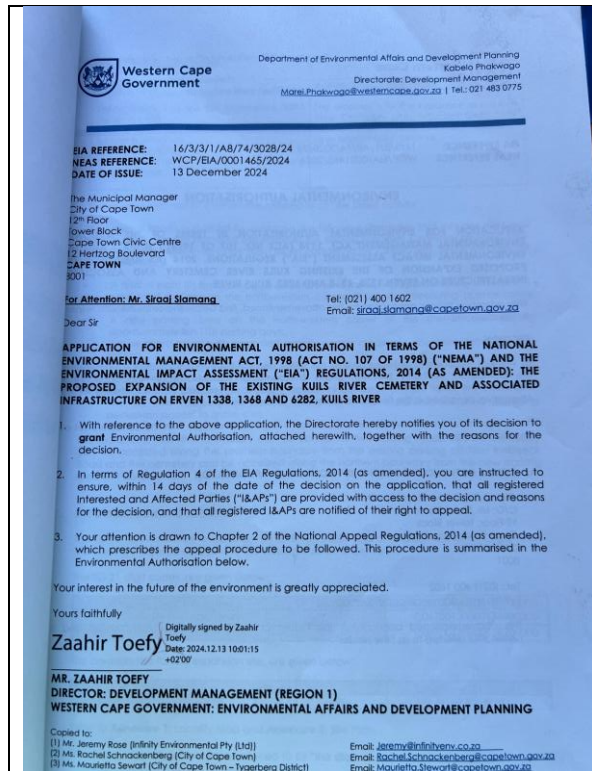


PHOTO 1: EA in site file

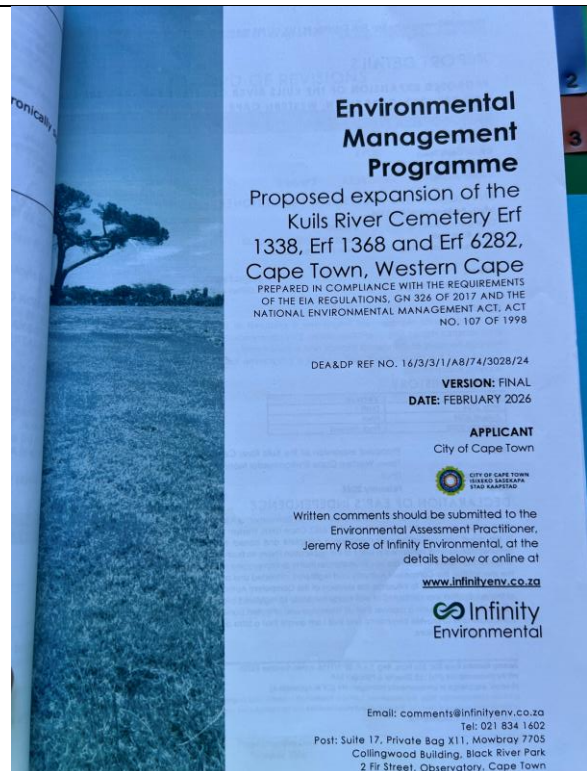


PHOTO 2: EMP in site file

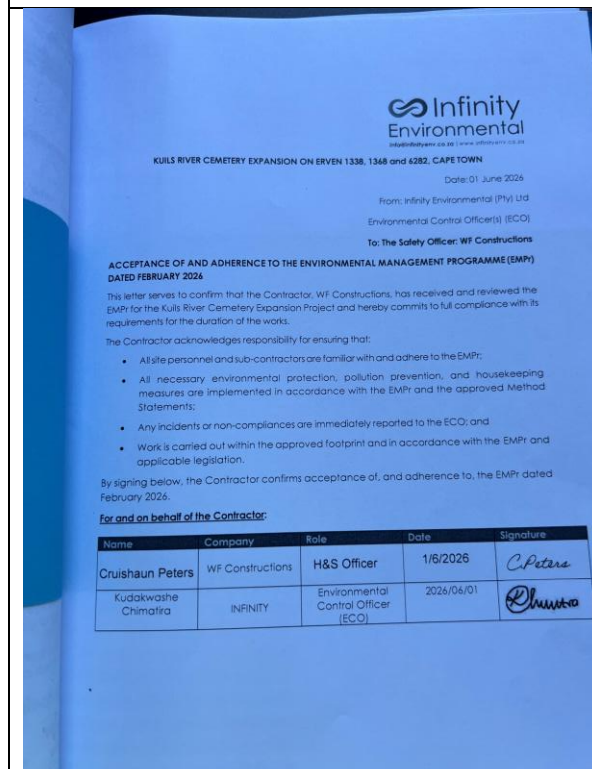


PHOTO 3: Acceptance of and adherence to the EMP Feb 2026

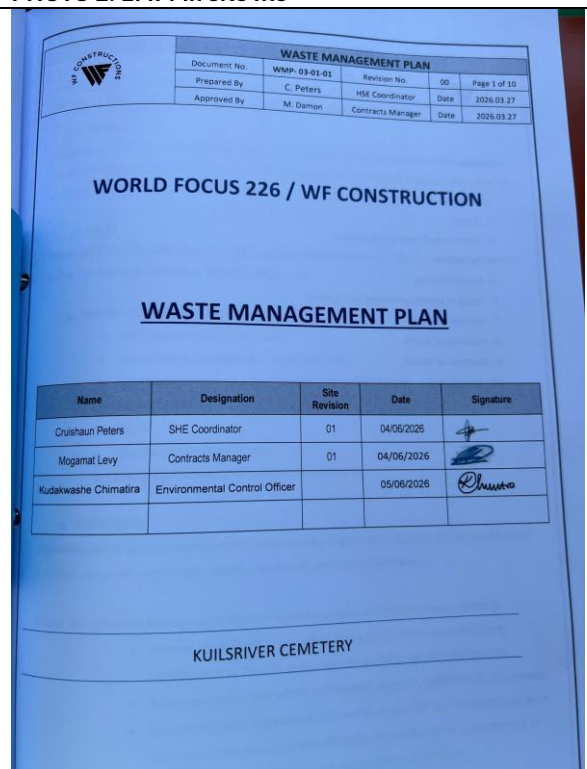


PHOTO 4: Contractor Waste Management plan in site file



PHOTO 5: Site camp



PHOTO 6: Ablution facilities on site



PHOTO 7: Spill kit on site



PHOTO 8: Tack drums in a designated area but no soil protection and not in a bunded area



PHOTO 9: Waste collected to clean the site (from informal settlement) stockpiled and awaiting disposal



PHOTO 10: Legacy rubble stockpiles from previous contractor awaiting disposal



PHOTO 11: Sand stockpiles on site could give rise to dust generation



PHOTO 12: Water truck if needed for dust control



PHOTO 13: Site looking north - clean and tidy



PHOTO 14: Site looking east – clean and stable



PHOTO 15: Site looking west



PHOTO 16: Good use of drip trays under generator and pump



PHOTO 17: Careful cement product handling



PHOTO 18: Designated kerb mix area which is lined with DPC plastic



PHOTO 19: Capped monitoring borehole (MW3)



PHOTO 20: Capped monitoring borehole (MW1) but the concrete cover is damaged and requires repair



PHOTO 21: Informal settlement on site producing refuse/litter

Note that MW2 has been reported as installed but could not be located during the audit inspection; we suspect it may be under or between the informal settlement

The above photos were taken by the auditor on 1 July 2026.



Monitoring well locations for reference.

The following photograph was supplied by the ECO following the audit inspection to demonstrate repair of the concrete surround to MW1:

