
Environmental Management Audit - NEMA EIA Reg 34 Post Construction Audit – November 2025

Light Industrial Development and Associated Infrastructure on Erf No. 40921, Formerly Known as Portion 69, Bellville City of Cape Town, Western Cape

DEA&DP Reference: 16/3/3/5/A8/15/3034/24-B

DRAFT REPORT

4 DECEMBER 2025

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**Prepared for:
Zenprop Property Investments (Pty) Ltd.**

Executive Summary

This external environmental audit was undertaken in terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), to assess the project's compliance with the Environmental Authorisation (EA: 16/3/3/5/A8/15/3034/24-B, issued 29 July 2024 and the Environmental Management Programme (EMPr) dated April 2016. The audit inspection took place on 11 November 2025 and reviewed both site conditions and documentary evidence for the audit period July 2024 to November 2025.

Key Findings

- Construction of the light industrial development on Erf 40921, Bellville is complete. The review found that the project has achieved a high level of compliance with the EA and EMPr requirements. **No EA non-compliances were recorded. Three EMPr items were rated as partial compliance**, relating to cement mixing on unprotected soils, securing of portable toilets, and ongoing litter control during portions of the construction period. **All issues were addressed and closed out during construction.**
- The site was found to be clean, stable and well landscaped at the time of the audit. No evidence of pollution, erosion, sedimentation or ecological disturbance was observed, and the riparian buffer along the Kuils River remained intact and undamaged.
- Oversight from the Environmental Control Officer was consistent, and monthly reporting demonstrated continuous monitoring and corrective action where required.
- The project has met all four Key Performance Indicators (KPIs) set out on page 12 of the EMPr, namely:
 - No complaints from landowners;
 - No significant environmental incidents;
 - No incidents leading to litigation or legal contraventions;
 - No residual environmental damage requiring additional rehabilitation measures.
- The EMPr is generally adequate for construction-phase risk management. Minor areas where the EMPr could be strengthened in future projects (e.g. clarity around the fines process in Section 1.2.7 and more outcome-based structure) have been noted, but no amendments are recommended for this completed project.

Recommendations

- The auditor recommends that the areas seeded with veld grass be monitored for successful establishment to ensure soil stability, particularly on the banks of the attenuation pond.

The next external audit report is due by **30 November 2030**, in line with Condition 8.3 of the EA.

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Abbreviations	
DEA&DP	Department of Environmental Affairs and Development Planning
EA	Environmental Authorisation (Ref: 16/3/3/5/A8/15/3034/24-B issued on 29-07-2024)
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme (<i>Environmental Management Plan Pre-construction and Construction, S.E.F Rev 2: April 2016</i>)
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act (No 107) of 1998
MS	(Environmental) Method Statement
MSDS	Material Safety Data Sheet
Designations and Definitions	
Auditor: The external independent environmental auditor, Mrs Christine Rabie	
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.	
Client Agent: Chris Hatting (Capex Projects)	
Contractors (Principal): Umzali Civils (civils infrastructure) and Abbydale (buildings)	
EA Holder: Zenprop Property Investments (Pty) Ltd.	
Environmental Control Officer (ECO): Jeremy Rose and Kudakwashe Chimatira from Infinity Environmental (Infinity)	
Evidence: Written records or physical evidence or observations or oral statements given during interviews. Where possible oral statements are corroborated between more than one independent party.	
Site/Development: Project site located at Erf No. 40921, Bellville, specifically the area that contains the activities authorised by the EA.	

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions was appointed on behalf of the EA Holder, Zenprop Property Investments (Pty) Ltd., to undertake the post-construction external environmental audit of this project's compliance with the conditions of the Environmental Authorisation (EA) Ref. 16/3/3/5/A8/15/3034/24-B, as issued by the Department of Environmental Affairs and Development Planning (DEA&DP) on 29 July 2024 and amended on 25 April 2025, as well as the Environmental Management Programme (EMPr) for the project, dated April 2016.

The project entails (per the EA) the following:

- The establishment of a light industrial development and associated infrastructure on Erf No. 40921, formerly known as portion 69, Bellville. The development consists of industrial buildings, on-site roadways, stormwater infrastructure including attenuation ponds and swales, parking areas of hard and soft landscaping, and onsite services. Access is obtained from Cilmor Street at the southwestern corner of the site. (Refer to the Site Plan in Figure 1 below.)

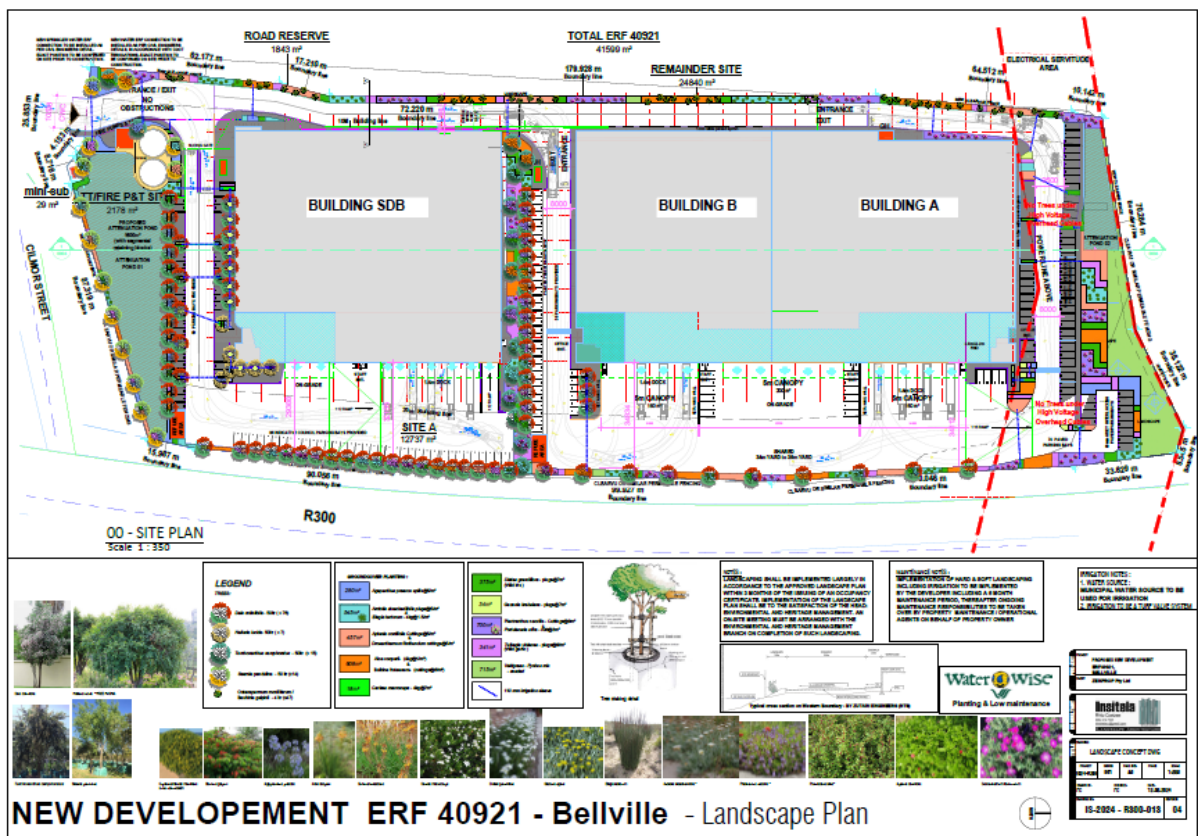


Figure 1: Site Plan (Figure sourced from the EA)

Work commenced on site in July 2024, and at the time of the audit site inspection, on 11 November 2025, the construction project was completed.

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 Conditions of the EA, which are as described below. 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 8.4 of the EA requires that an audit be conducted on the project's compliance with the conditions of the issued Authorisation and EMPr, per Section 34 of the NEMA EIA Regulations, within 6 months of the completion of the construction activities.

1.2.2 NEMA EIA Regulation 34 Requirements

NEMA Regulation 34 requires the holder of the Authorisation to ensure that compliance with the conditions of the EA and EMPr is audited by an independent person with relevant environmental auditing expertise and submit an environmental audit report to the competent authority (in this case, the 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 requires	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	Section 4

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	
(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 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 project EA, EMPr and other relevant background documents, and prepare information requirements and checklists for the audit;
- **Audit - site inspection, interviews and document review:** Conduct a site inspection, interview* relevant management and construction personnel/project consultants and review submitted documentary evidence to verify compliance of the development with the Conditions of the EA and EMPr requirements (* interviews can be done at the time of the site inspection, telephonically or information can be requested via email);
- **Review the EMPr** in terms of its effectiveness and scope to mitigate environmental risks/impacts on the site, based on the findings of the site inspection, interviews and compliance audit and recommend EMPr amendments if deemed required;
- **Draft audit report** of findings and recommendations and issue draft to relevant project personnel to check for accuracy and fairness and provide any missing information;
- **Finalise the audit report** and submit to the 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 audit is undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014 (as amended). It is not a full legal compliance audit of all applicable environmental legislation. The scope is restricted to assessing compliance with the Environmental Authorisation (EA) conditions and Environmental Management Programme (EMPr) requirements relevant to this project and applicable to the phase of work undertaken during this audit period.
- The audit period covers the time since the commencement of project activities, or the previous audit (where applicable), up to the date of this audit. Findings are therefore based on both conditions observed during the audit inspection and records of environmental performance over the audit period.

- As the audit inspection represents a single point in time, it cannot directly verify the management of all activities or capture contraventions that were not observable or documented.
- The audit findings and conclusions are based on the auditor's observations and on information provided by project personnel. This information has been assumed to be correct. Wherever possible, verification was undertaken through visual inspection or review of supporting documentation. The auditor cannot be held responsible for findings or conclusions resulting from inaccurate or incomplete information, or from information withheld or not made available during the audit.

2 METHODOLOGY

2.1 Approach

The auditor tabulated requirements from the EA and EMPr, in the Audit Checklist in Section 3.2 that follows. These are the items which have been investigated and assessed during the audit. The audit site inspection was undertaken on the 11th of November 2025 by auditor Christine Rabie, accompanied by the Development's appointed Environmental Control Officer, Kudakwashe Chimatira.

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

- **Construction contract table of contents excerpt (Vusela Consulting)** – demonstrating the inclusion of the EMPr in the construction contract.
- **Environmental Authorisation:** Ref: 16/3/3/5/A8/15/3034/24-B issued on 29 July 2024, as amended on 25 April 2025.
- **Environmental Management Programme:** Environmental Management Plan Pre-construction and Construction, S.E.F, Rev 2: April 2016
- **Environmental Awareness Induction Registers**, presented by ECO, dated 11-12-2024.
- **ECO Reports:** July 2024 – October 2025; ECO Closure Report, November 2025, Infinity.
- **Notification of I&APs of the EA decision**, Infinity Environmental, letter via e-mail dated 5 August 2024.

It is noted that the EMPr was drafted for the greater development site, of which the project being audited forms part. As such, some of the requirements of the EMPr are not relevant to this project; for example, river corridor rehabilitation work falls outside the scope of this project. There is a Water Use Licence No. 19/G22E/A/11 issued to the greater development site related to the Kuils River rehabilitation works, which is the responsibility of the Holder, Cilmor Trust, and not the developer of this project.

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

3 COMPLIANCE AUDIT

3.1 Compliance Checklist: Notes and key to compliance columns:

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

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

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

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

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

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

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

The completed Compliance Checklist of findings follows:

3.2 Compliance Audit Findings:

3.2.1 Compliance with the Conditions of the Environmental Authorisation

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
1.	<p>The holder must in writing, within 14 (fourteen) calendar days of the date of this decision 1.1 notify all registered I&APs of 1.1.1 the outcome of the application; 1.1.2 the reasons for the decision as included in Section B; 1.1.3 the date of the decision; and 1.1.4 the date when the decision was issued. 1.2 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 D (of the EA); 1.3 draw the attention of all registered I&APs to the manner in which they may access the decision; and 1.4 provide the registered I&APs with: 1.4.1 the name of the holder (entity) of this Environmental Authorisation; 1.4.2 name of the responsible person for this Environmental Authorisation; 1.4.3 postal address of the holder; 1.4.4 telephonic and fax details of the holder; 1.4.5 e-mail address, if any, of the holder; and 1.4.6 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>	COMPLIANT	<p>Infinity notified the registered I&APs of the amended EA via email on 5 August 2024.</p> <p>All the required information was either contained in the notification letter or the amended EA attached thereto.</p>
2.	<p>The minimum building setback line of 10 m on the eastern side of the Kuils River along Erf No. 40921 (formerly known as Portion 69) will be used as an access road of up to 8 m wide, and will include a planted, landscaped edge of at least 2 m wide. Indigenous shrubs must be planted within the landscaped edge at an interval of no more than 2.5 m.</p>	COMPLIANT	<p>The required 10-meter buffer, including the planned landscaped edge of 2 meters, was evident on site (refer to the Photo Sheet).</p>

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
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.	Any changes to, or deviations from the scope of the authorised development described in paragraphs 5 and 6 of Section A of the EA must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented.	NOT REQUIRED	No changes/deviations to the authorised scope were required, observed by or reported to the auditor.
5.	The holder must appoint a suitably experienced Environmental Control Officer (“ECO”), or site agent where appropriate to ensure compliance with the Environmental Management Programme (“EMPr”) and the conditions contained herein.	COMPLIANT	Infinity was appointed as the ECO for the project. Monthly compliance monitoring was undertaken, as evidenced by the ECO reports provided to the auditor.
6.	A copy of this amended Environmental Authorisation and the EMPr, audit reports and compliance monitoring reports must be kept at the site office and must be made available to anyone on request.	COMPLIANT	The ECO reports confirmed that the file with the EA, EMPr and compliance monitoring reports was kept on site during the construction phase.
7.	Access to the site referred to in paragraph 6 of Section A above must be granted and this amended Environmental Authorisation and EMPr 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. The amended Environmental Authorisation and EMPr must also be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site.	COMPLIANT	No authority inspections were reported. The ECO reports confirmed that the file with the EA and EMPr was kept on site during the construction phase and was available for inspection.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
8.	<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 this amended Environmental Authorisation and the EMPr and submit environmental audit reports to the competent authority. 8.1 The 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); 8.2 The first audit report must be submitted to the competent authority within three (3) months of commencement of the proposed development, as described in this amended Environmental Authorisation; 8.3 Thereafter, an Environmental Audit Report must be submitted to the competent authority every five (5) years while the Environmental Authorisation remains valid; 8.4 An environmental audit report must be submitted to the competent authority within six (6) months of completion of the construction activities; 8.5 The audit reports must indicate compliance status with the conditions of this amended Environmental Authorisation and the EMPr and make recommendations for improved environmental management; 8.6 The holder must, within seven (7) days of the submission of an audit report to the competent authority, notify potential and registered I&APs of the submission and make the report available to anyone on request; and 8.7 If the audit reports are not submitted, the competent authority may give 30 days' written notice and may have such an audit undertaken at the expense of the applicant and may authorise any person to take such measures necessary for this purpose.</p>	COMPLIANT	<p>The current requirement (the post-construction audit report per 8.4) is fulfilled by the submission of this audit report. It includes the requirements of Appendix 7 of the EIA regulations as set out in section 1.2.2 of this report and has been done in the required time frame (within 6 months of completion of construction activities).</p> <p>Note regarding the first audit required by 8.2: ECO, Kudakwashe Chimatira of Infinity, stated via email on 3 November 2025 that the Construction Phase External Audit Report referenced in EA 8.2 was not undertaken since <i>“the Amended Environmental Authorisation was issued more than three months after construction activities had commenced (in terms of the original EA). This matter was communicated to DEA&DP, and they confirmed that this arrangement was acceptable.”</i> No written confirmation from the DEA&DP was available for the record and review by the auditor.</p>

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
9.	Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). 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: archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features; rock art and rock engravings and graves or unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	NOT APPLICABLE	No heritage remains were reported discovered on site during construction.
10.	An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a landfill licensed in terms of the applicable legislation.	COMPLIANT	Waste was reported by the ECO to have been separated on site, e.g. separation of recyclable scrap metal. No disposal to non-licensed facilities was reported.
11.	Surface 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.	COMPLIANT	No significant pollution issues were reported.
12.	No noxious industries are allowed as part of development.	COMPLIANT	None were observed or reported.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
13.	The holder must notify the competent authority in writing, within 24 hours thereof if any condition herein stipulated is not being complied with.	NOT REQUIRED	No EA condition non-compliances needed to be reported.
14.	The holder must submit an application for amendment of this amended Environmental Authorisation in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) to the competent authority where any detail or scope with respect to this amended Environmental Authorisation must be amended, added, substituted, corrected, removed or updated.	NOT REQUIRED	No amendments were required.
15.	Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the competent authority must only be notified of such changes.	NOTED	Noted.
16.	Non-compliance with a condition of this amended Environmental Authorisation or EMPr may result in suspension of this amended Environmental Authorisation and may render the holder liable for criminal prosecution.	NOTED	Noted.

3.2.2 Compliance with the Requirements of the Environmental Management Programme

The project has met all 4 Key Performance Indicators as set out on page 12 of the EMPr, namely:

- No complaints from landowners;
- No significant environmental incidents;
- No incidents leading to litigation and legal contraventions;
- No residual environmental damage that needs rehabilitation measures to be taken.

Detailed comments on EMPr compliance, based on information recorded in the ECO reports and the auditor’s post-construction site inspection, follow. Compliance over the whole construction period was considered, but only repeated, serious or unresolved issues are rated as non-compliances.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
PRE-CONSTRUCTION				
1.	A1 – Project Contract & Programme	Contract provisions; EMP in tender docs; available on site	COMPLIANT	EMP confirmed to have been included in the construction contract (as verified by the Contract Table of Contents provided), and a copy was kept on site in the file.
2.	A2 – Appointments & Duties/1.2.10	ECO, ER, EO, contractor, ESO appointments; signed declarations; ECO given environmental awareness training, toolbox talks by ESO/EO	COMPLIANT	Capex Projects provided project manager services. Infinity provided consistent ECO oversight throughout the project . The contractor safety officers on site acted as the EOs. Attendance registers for ECO awareness sessions were provided.
3.	A3 – Method Statements/1.2.11	Approved for all activities before commencement; training records (job-specific training related to MS)	COMPLIANT	Method statements were in place. Some delays in updating method statements were recorded in December 2024 but were corrected in early 2025.
4.	A4 – Site Demarcation & Development	No-go fencing; permits in place	COMPLIANT	Site boundary demarcation was reported to be in place and generally maintained intact for the duration of the contract. Work commenced with the required EA approvals in place.
5.	A5 – Emergencies & Non-compliance/ 1.2.7	Spill/fire method statements; fines/remediation for non-compliances	COMPLIANT	No incidents or issued penalties were reported. ECO required method statements were provided. While no serious non-compliances were recorded, repeated issues with the litter on site could have constituted a finable offence per the EMPr criteria.
CONSTRUCTION				

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
6.	C1 – Stockpiles	Stable, no signs of sedimentation/erosion, approved locations/footprint, topsoil stockpiled separately, protected and ≤ 2 m high; inert imported fill	COMPLIANT	No stockpiles remain on site, and the site is stable. No significant issues regarding erosion of stockpiles were recorded during construction. One occurrence of a soil stockpile higher than 2m was recorded in July 2025 but was resolved.
7.	C2 – Oil & Chemicals	Secure, banded storage ≥ 1.5× volume; drip trays under parked plant/machinery, spill kit on site, no pollution events/I&AP complaints	COMPLIANT	No oils/fuels remain stored on site. Storage of oils and chemicals was reported to be satisfactory during the construction phase. One occurrence of a drip tray not provided to a portable generator was recorded in July 2025, but no pollution was reported and there were no other findings.
8.	C3 – Cement & Concrete	Mixing at designated sites, on impermeable surface; no pollution events, no cement residues/waste remains on site	PARTIALLY COMPLIANT	No cement residues remain on site. Management was generally compliant, but mixing with cement products on unprotected soils near the Kuils River was recorded in March 2025 and November 2024. Also, empty cement bags were reported to be unsecured in Oct–Nov 2024; corrected Dec 2024. Due to the proximity to the riparian area and the fact that these findings were flagged as priority issues by the ECO, partial compliance is recorded for this item.
9.	C4 – Storage of Dangerous/ Toxic Materials	Locked banded ventilated store; MSDS; no pollution events or residual spills	COMPLIANT	No dangerous/toxic materials remain stored on site, and no spills were observed. Secure storage was reported throughout construction.
10.	C5 – Bulk Fuel/Oil Storage	Bund ≥ 110 % of tank volume; outside trafficked areas, covered against rain, no pollution events or residual spills	COMPLIANT	No oils/ fuels remain stored on site, and no spills were observed. Secure storage was reported throughout construction.
11.	C6 – Use of Dangerous/ Toxic Materials	Spill response materials on site, no pollution events or residual spills	COMPLIANT	No residual pollution/ unresolved spills were recorded on site.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
12.	D1 – Eating Areas & Camp Followers	Designated eating area; bins; no fires, no evidence of vermin/flies, food not accessible to wildlife, no traders outside site. (<i>Litter control is included in D-3</i>)	COMPLIANT	No issues were reported. One report of an informal trader at the site entrance was reported in February 2025, but was addressed and not repeated.
13.	D2 – Toilets & Ablutions	≥ 1 / 15 workers; serviced; secured, max 50m from work area, approved location, no pollution	PARTIALLY COMPLIANT	Toilets were provided. Failure to secure the toilets to the ground was a repeated issue noted by the ECO over several months, and therefore, a partial compliance rating is given overall.
14.	D3 – Waste Management	Segregation (hazardous, general, reusable, recyclable); sufficient secure and closed bins/skips provided ≥100m from river, proof of legal disposal, site neat and tidy, no complaints, no residual litter/pollution	PARTIALLY COMPLIANT	The site was clean and free of waste (related to the construction contract) at the time of the audit. Segregation of waste and adequate bins/waste cages were reported during construction. However, litter was noted by the ECO for many months, and in some cases, waste collection areas were not secured, and waste was dispersed by wind. Therefore, a partial compliance rating is given for project performance overall.
15.	D4 – Dust Control	No visible dust/complaints recorded; loads covered, non-potable water for dust control	COMPLIANT	The site has been landscaped, and no significant residual dust risk is noted. No dust complaints were reported over the construction period.
16.	D5 – Workshop Equipment & Maintenance	Bunded wash bay; drip trays used during servicing; spill kits, spills addressed sufficiently and no residual pollution	COMPLIANT	No issues were recorded.
17.	D6 – Noise	≤ +7 dB baseline; working hours 07h00–18h00, no complaints from surrounding landowners/I&AP's	COMPLIANT	No complaints or exceedances were recorded.
18.	E1 – Crew Camps	No overnight accommodation; no litter, no pollution	COMPLIANT	No issues were recorded. See audit item 14 (D3) for general site litter issues.
19.	E2 – Fires	Only in approved areas; no waste burning; no fire damage	COMPLIANT	No unauthorised fires or damages were recorded.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
20.	E3 – Erosion and Sedimentation	Limit disturbance; protect exposed soils; maintain silt fences, berms & storm-water controls; rehabilitate eroded areas.	COMPLIANT	No significant erosion/sedimentation was observed on site. The site has been stabilised with retaining blocks, grass blocks and landscaping. A silt fence was installed along the river boundary during construction remains in place.
21.	E4 – Fauna	No injury/trapping/disturbance of wildlife; relocate trapped fauna via ECO.	COMPLIANT	No injury/trapping/disturbance of wildlife was recorded.
22.	E5 – Flora	Protect indigenous vegetation; remove aliens; retain riparian buffer; rehabilitate cleared/damaged areas, no planting of exotics.	COMPLIANT	No alien and invasive vegetation remains on site. Indigenous vegetation has been established, including seeding with veld grass along the northern boundary and banks of the stormwater attenuation facility. No unauthorised clearing/damage to existing indigenous vegetation in no-go areas was reported.
23.	E6 – Heritage Resources	No negative impact on heritage resources	COMPLIANT	No heritage material was reported during construction.
24.	E7 – No-go/ Sensitive Areas	Construction within the boundaries of the site; no vehicles into the river, no go areas demarcated	COMPLIANT	No damage to no-go areas was reported.
25.	E8 – Access Routes and Haul Roads	Access restricted to authorised routes; no erosion; rehabilitated on closure.	COMPLIANT	All access was/is via Cilmor Street entrance. Roads and road edges are stable. No off-road driving was recorded.
26.	E9 – Crime, Safety and Security	Fencing & controlled access maintained; emergency contact numbers.	COMPLIANT	Boundary security fencing is in place. No trespass incidents were reported.
27.	E10 – Visual Impact	No negative visual impact; rubble and litter control; restore visual quality (landscaping).	COMPLIANT	All temporary offices and stockpiles removed, bar one site container that would be removed on or just after the day of the audit inspection. The site has been left in a neat condition. Apart from litter/waste management issues noted in audit item 14 (D3), no visual impact issues were recorded during construction.
28.	E11 – Geotechnical Stability	No backfill deterioration or trench collapse	COMPLIANT	Excavations closed and compacted; no settlement or subsidence was evident.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
29.	E12 – Hydrology and Freshwater	Kuils River buffer protected; no runoff /erosion/ sedimentation/ pollution into the water course; stabilise banks. Attenuation ponds are in place.	COMPLIANT	The riparian zone is stable and vegetated, and no evidence of pollution was observed. Attenuation ponds are in place to the north and south of the site. Outfalls into the riparian area are stabilised (grass blocks). No significant issues were recorded during the construction phase.
30.	E13 – Soil Management	Strip and stockpile topsoil (< 2 m); reuse in rehab; avoid compaction, weed growth; stable backfill slopes, graded into the surrounding area.	COMPLIANT	The site backfill is graded, stable, and the landscape planting is establishing.
31.	F1 -Botanical Impact	Indigenous planting only	COMPLIANT	All landscape planting observed is indigenous.
32.	F2 – Heritage Impact	Retained trees protected	NOT APPLICABLE	There are no protected/retained trees on site.
33.	F3 – Traffic Impact	Implement TIA recommendations	COMPLIANT	Access managed via the approved entrance off Cilmor Street. No traffic management issues were reported during construction.
34.	F4 – Freshwater Impacts	No obstructions/rubble left in river channel, no damage to the sewer line, pipeline not exposed, no signs of erosion in river corridor as a result of works, stormwater discharges into the stormwater system/ponds, not directly into river, bank rehabilitation, AIS control, ablution facilities outside river channel	COMPLIANT	Work in the Kuils River corridor did not form part of this project's works, and this was treated as a no-go area. No pollution and no damage to the river or adjacent sewer line were noted because of the contractor's activities on this project. Stormwater is directed into attenuation ponds on site.
35.	F5 – HIA and SWMP	Flood storage capacity (area just north of Bottelary bridge), anti-erosion structures, no scour around Cilmor bridge.	COMPLIANT	Stormwater features installed and functional; slopes stabilised, and no erosion was observed.
36.	F6 – Rehabilitation and Landscaping	Implement final landscaping plan; indigenous planting; remove weeds and waste.	COMPLIANT	Landscaping and rehabilitation were completed. The site was noted to be clean and stable at closure. No noxious weeds were observed. All landscape planting was noted to be indigenous. The areas that have been seeded with veld grass should be monitored for successful establishment and stability.

4 EMPr REVIEW

4.1 Scope of the EMPr review

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

4.2 Relevance/shortcomings of the EMPr

No serious shortcomings have been identified regarding impact mitigation outcomes or management actions, either by the ECO or the auditor.

The auditor notes that the EMPr is from 2016 and therefore contains some outdated terminology, legislative references, and style, most notably related to clear differentiation between outcomes and methods. The non-compliance section 1.2.7 could be strengthened since it specifies that each non-conformance not addressed within 2 weeks constitutes a fine, but does not define how the value of a fine is derived (quantum/formula/link to severity/ ceiling) or set clear responsibilities and process for imposing such fines. This creates enforcement uncertainty and leaves room for disputes between the contractor, engineer, and ECO.

4.3 Recommendations for EMPr amendment

Since construction is complete, no recommendations are made for the amendment of the construction phase EMPr.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This implementation-phase audit of the EA/EMPr conditions recorded **full compliance with the conditions of the EA and three partial-compliances with the EMPr during the construction phase**, relating to:

- Cement mixing on unprotected soils and management of empty cement bags
- Litter control and securing of collected waste against wind dispersal
- Securing of portable toilets.

All reported issues were resolved/closed out.

The adjacent riparian area was well protected and oversight by the ECO was consistent and detailed throughout.

No amendments to the EMPr have been recommended.

The site was clean, stable and well landscaped at the time of the audit inspection. The auditor does recommend that the areas seeded with veld grass be monitored for successful establishment to ensure soil stability, especially on the banks of the attenuation pond.

The next external audit report is due in 5 years by **30 November 2030**.

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

6 DECLARATIONS & CREDENTIALS OF THE INDEPENDENT AUDITOR

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



Signed by **Christine M.M Rabie on 4 December 2025**

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

1.1 AUDIT PHOTO SHEET



PHOTO 1: Site entrance off Cilmor Street, Kuils River, is to the left of the photo



PHOTO 2: Site entrance off Cilmor Street



PHOTO 3: Landscaped and stabilised verge between the road and the riparian area to the west of the site



PHOTO 4: Landscaped verge between the road and the riparian area to the west of the site



PHOTO 5: Stormwater attenuation facility north of the site (note that this has been seeded with veld grass, which still needs to establish – this must be monitored to ensure successful establishment and ongoing stability of the area).



PHOTO 6: Stabilised outfall into riparian area from northern attenuation facility



PHOTO 7: Landscape planting along the edges of the northern roadway. Note the area behind has been seeded, but vegetation cover still needs to establish.



PHOTO 8: Eastern side of the site – landscaping evident



PHOTO 9: Landscaping with indigenous plants



PHOTO 10: Southern attenuation facility, banks are stabilised

The above photos were taken by the auditor on 11 November 2025.