
Environmental Management Audit - NEMA EIA Reg 34 Audit – June 2026

Redevelopment of the Zeekoevlei and Rondevlei Weir Complex False Bay Nature Reserve: Phase 1

City of Cape Town Metropolitan Municipality, Western Cape Province

DFFE Reference: 14/12/16/3/3/1/3021

FINAL REPORT

27 JULY 2026

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

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 Redevelopment of the Zeekoevlei and Rondevlei Weir Complex (Phase 1). The audit assessed compliance with the Environmental Authorisation (DFFE Ref. 14/12/16/3/3/1/3021) and the Environmental Management Programme (EMPr) during the period from the commencement of construction in April 2026 to the audit date. The audit comprised a review of project documentation, interviews with project personnel and a site inspection undertaken on 25 June 2026.

At the time of the audit, construction was approximately three months into implementation and was limited to the Phase 1 Zeekoevlei Weir works. The Rondevlei component and downstream fishway works had not yet commenced, while rehabilitation activities were not yet applicable. Overall, the project demonstrated a high standard of environmental management and was found to be substantially compliant with the applicable Environmental Authorisation and EMPr requirements. No material non-compliances resulting in significant environmental harm, uncontrolled pollution or lasting adverse environmental impacts were identified during the audit period.

The EMPr remains appropriate and effective for managing the current phase of construction. During the audit period, Figures 2 and 4 of the EMPr were amended to provide for a larger temporary working area. The amendment relates to an impact management action and does not alter the approved impact management outcomes. The auditor supports the amendment, and no further amendment to the EMPr is recommended as a result of this audit.

Key Findings

- Environmental controls were well established for this early stage of construction. The construction footprint was appropriately demarcated, the site was neat and well managed, and environmental management systems, registers and method statements were in place.
- Works within and adjacent to the aquatic environment were being carefully managed using cofferdams and other isolation measures. No evidence of uncontrolled discharge of contaminated or sediment-laden water into the surrounding watercourse was observed or reported during the audit.
- A hydraulic oil spill resulting from equipment failure was responded to promptly, contained effectively and cleaned up with no observed impact on the adjacent aquatic environment.
- As water began overtopping the weir, the project entered a higher environmental risk phase requiring routine pH and turbidity monitoring. The first post-audit monitoring undertaken on 1 July 2026 confirmed that the recorded turbidity increase remained below the EMPr threshold and supported the effectiveness of the implemented containment measures. No visible downstream construction-related water-quality impact was reported; however, direct downstream measurements could not be obtained safely due to high flows. Continued monitoring remains necessary while in-stream concrete works continue.
- No fauna mortality or unauthorised disturbance of protected species was recorded during the audit period. Hippo exclusion measures were in place and effective. Implementation of the required daily fauna inspection registers for excavations and in-stream works will strengthen environmental record-keeping and ongoing compliance verification.

Strengths Observed

- A well-organised environmental management system, supported by comprehensive site documentation, method statements and monitoring records.
- Good environmental oversight by the Environmental Control Officer and Contractor's Environmental Officer, with regular inspections and effective implementation of environmental controls.
- A proactive approach to protecting the surrounding aquatic environment through careful planning of in-stream works and effective pollution prevention measures.
- Good site housekeeping and environmental awareness, reflecting a positive commitment by the project team to environmental compliance and continual improvement.

Key Recommendations

- Continue implementing routine pH and turbidity monitoring whenever construction activities have the potential to affect surface water. Monitoring should include suitable upstream/background, impact-area and downstream sampling points, with results assessed against the applicable EMPr requirements and retained for audit verification.
 - Complete and maintain the required daily fauna inspection registers for open excavations and trenches, and during flow diversions and cofferdam installations, including confirmation of inspections and details of any fauna observations or relocations.
 - Obtain and retain documentary proof of lawful disposal for contaminated material generated during the June 2026 hydraulic oil spill.
 - Submit the amended EMPr with this audit report to DFFE for notification and record purposes in terms of Regulation 36(1) of the EIA Regulations.
 - Undertake the next external environmental audit in June 2027, in accordance with the 12-monthly audit programme specified by the EMPr.
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Table of Contents

1	INTRODUCTION.....	6
1.1	BACKGROUND.....	6
1.2	SCOPE AND TERMS OF REFERENCE	7
1.3	ASSUMPTIONS AND LIMITATIONS.....	9
2	METHODOLOGY	10
2.1	Approach	10
2.2	Assessment and classification.....	10
3	COMPLIANCE AUDIT.....	11
3.1	Compliance Checklist: Notes and key to compliance columns:	11
3.2	Compliance Audit Findings:	12
4	EMPr REVIEW.....	32
4.1	Scope of the EMPr review	32
4.2	Relevance and effectiveness of the EMPr.....	32
4.3	EMPr amendment.....	32
5	CONCLUSIONS & SUMMARY OF RECOMMENDATIONS	33
6	DECLARATIONS & CREDENTIALS OF THE INDEPENDENT AUDITOR.....	34
7	APPENDICES:	35
7.1	AUDIT PHOTO SHEET.....	35

Abbreviations	
DFFE	Department of Forestry, Fisheries, and the Environment
EA	Environmental Authorisation (<i>Ref: 14/12/16/3/3/1/3021 issued on 18 March 2025</i>)
ECO	Environmental Control Officer
EO	Environmental Officer (of the Contractor)
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme (<i>Environmental Management Programme: Redevelopment of the Zeekoevlei and Rondevlei Weir Complex, False Bay Nature Reserve, Cape Town DFFE REF. 14/12/16/3/3/1/3021, Infinity Environmental, Revision 01, May 2026</i>)
FBNR	False Bay Nature Reserve
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended
MS	Method Statement
SDS	Safety Data Sheet

Designations and Definitions
Auditor: The external independent environmental auditor, Mrs Christine Rabie, who undertook this audit.
Audit period: The time period for which compliance with the Environmental Authorisation and EMPr is assessed. This extends from the commencement of project activities on site, or from the date of the previous Reg 34 audit (whichever is later), up to and including the date of the current audit. The audit period therefore covers the review of records of environmental performance during this timeframe, and is not limited to conditions observed on the day of the audit inspection.
Contractor (Principal): EMPA Structures (Pty) Ltd
Contractor's Construction Manager/Site Agent: Jason van Wyk
(Contractor's) Environmental Officer (EO): Ms Nandipha Dhlamini
EA Holder: City of Cape Town: Biodiversity Management Branch

Environmental Control Officer (ECO): Infinity Environmental (Infinity) represented by Tom Smyth and Olivia Murgatroyd.
Evidence: Written records or physical evidence or observations or oral statements given during interviews. Where possible, oral statements are corroborated between more than one independent party.
Engineer/client representative: Responsible for overseeing the contractual implementation of the works on behalf of the EA Holder. Provided by HHO c/o Gustav Beukman for this project.
Site/Development: For purposes of this audit, the Phase 1 Zeekoevlei works and associated authorised supporting infrastructure forming part of the Redevelopment of the Zeekoevlei and Rondevlei Weir Complex. Phase 2, comprising the Rondevlei works, was not under implementation and is excluded from the scope of the current audit.

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions was appointed by the City of Cape Town: Biodiversity Management Branch to undertake the first external environmental audit of the Redevelopment of the Zeekoevlei and Rondevlei Weir Complex. The audit was undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014, as amended, and assessed compliance with the Environmental Authorisation (DFFE Ref. 14/12/16/3/3/1/3021), issued on 18 March 2025, and the approved Environmental Management Programme, Revision 01, dated May 2026.

The audit site inspection was undertaken on 25 June 2026. At the time of the audit, construction was in Month 3 of the construction programme and only the Phase 1 works at Zeekoevlei were under implementation.

The Phase 1 project entails (per the EA) the following:

Modification of the existing Zeekoevlei weir

- Modification of the existing Zeekoevlei weir to allow for deeper drawdowns and more rapid lowering of the water level than the existing wooden penstocks. The filled level of the Zeekoevlei is 5.18 metres above mean sea level (mamsl), and the current sluice gate allows drawdown to 4.3 mamsl. The modification would extend the weir westwards with a new set of sluice gates that lower the potential drawdown level to 3.50 mamsl. This much deeper drawdown opportunity to more fully flush the vlei of nutrient-rich water and suspended sediments.

Construction of a new fish ladder or ‘fishway’

- Construction of a new fish ladder or ‘fishway’ between the Zeekoevlei Canal and the weirs, to allow for fish to move into Zeekoevlei from the channel. The fishway is intended to allow for the reconnection of Zeekoevlei with False Bay, and to enable indigenous freshwater and estuarine/marine fish recruitment into the vlei. The fishways have been designed in accordance with WRC Guidelines (Bok et al., 2007) and with inputs from ichthyofaunal specialists as set out in the specialist report and are designed to provide passage for locally indigenous fish species. They comprise a reinforced concrete channel with a sloping base and sloped baffles at 30 degrees, with a drop of 80mm between each 500mm long box.

Construction of a second fishway at the downstream sewer bridge

- Construction of a second fishway at the downstream sewer bridge, to allow estuarine fish passage past an existing concrete-encased foul sewer rising main structure which currently acts as a barrier to fish movement.

Various supporting infrastructure and activities including:

- A formalised parking area adjacent to the Zeekoevlei weir for maintenance vehicles.
- A culvert bridge across the Zeekoe canal immediately downstream of the existing weir apron, to carry construction vehicles, maintenance vehicles, and fire trucks. The culvert bridge would be constructed of box culverts, with ramp retaining walls and a reinforced concrete apron.
- Fencing around the weir areas.

- Hippo control spikes to prevent hippo access into the Zeekoevlei section of the nature reserve.
- A new gravel access road linking the lower sewer culvert fishway to an existing roadway on top of the eastern embankment. The new road would be approximately 35m in length and 4.8m wide. Its construction would require shaping of the embankment and the use of gabions to reduce the slope of the dunes.
- A new temporary gravel access road across the Billy's Block area of the reserve approximately 566m in length, linking Shoreline Drive to the works area and providing for construction vehicle access to the main weir area. Temporary stockpiling and site camp areas are also proposed within the Billy's Block area east of the weirs.

(Refer to the Site Plan in Figure 1 that follows.)

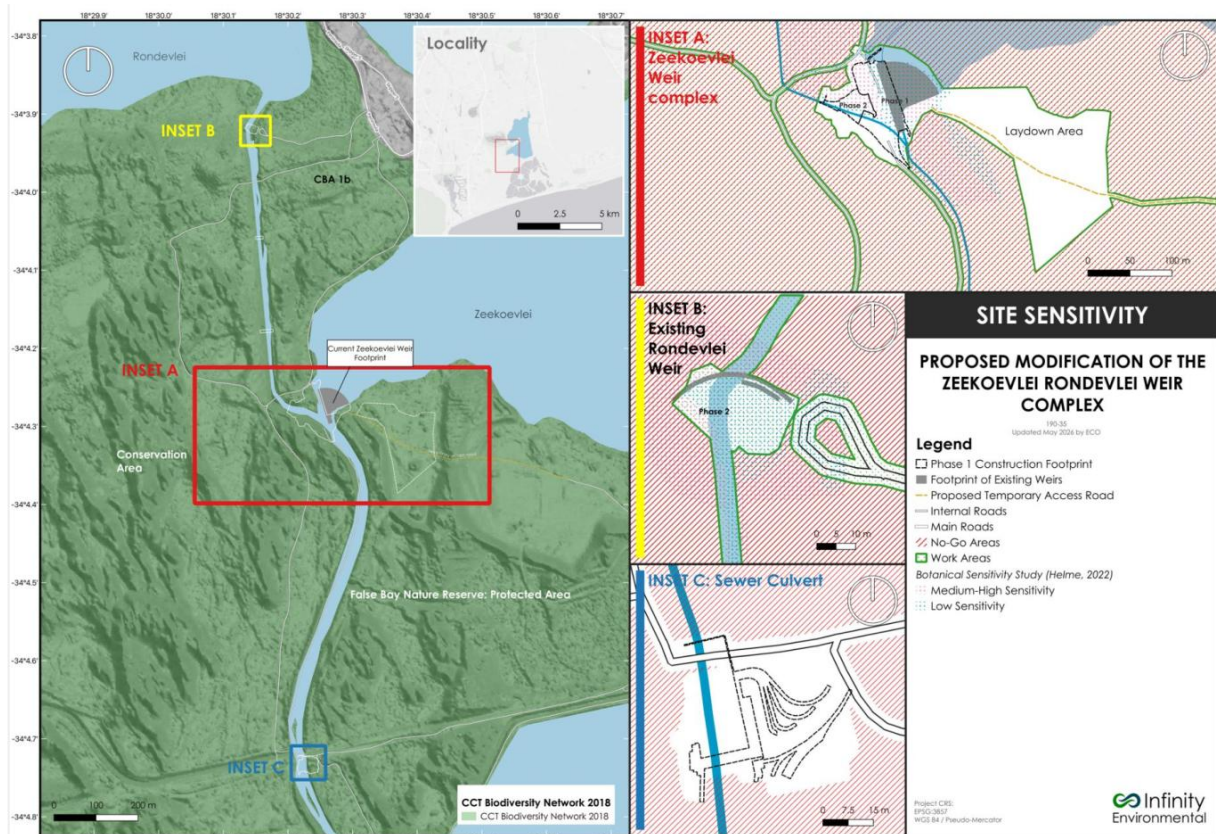


Figure 1: Site Plan (Figure sourced from the EMPr)

1.2 SCOPE AND TERMS OF REFERENCE

This audit and related report fulfil the requirements for external environmental audits as detailed in Regulation 34 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) EIA (Environmental Impact Assessment) Regulations as well as Conditions 25-28 of the EA, which are as described hereafter.

The current audit was limited to the Phase 1 works at Zeekoevlei. At the time of the audit, works associated with the second fishway at the downstream sewer bridge had not commenced. Phase 2, comprising the Rondevlei works, does not form part of the current construction contract and was not under implementation. Phase 2 was therefore excluded from the scope of this audit.

1.2.1 EA and EMPr requirements

Conditions 27 and 28 of the EA require audits to be conducted on the project's compliance with the conditions of the issued Authorisation and EMPr, per Regulation 34 of the NEMA EIA Regulations and per the frequency indicated in the EMPr, which is: 3 months after commencement of construction, every 12 months thereafter until practical completion as

defined by the Engineer, and after final completion of construction. The EA requires that the completion audit report be submitted within 30 days of the completion of implementation (site handover) and the final audit report within 30 days of the completion of rehabilitation activities.

1.2.2 NEMA EIA Regulation 34 Requirements

Regulation 34 of the EIA Regulations 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 to submit an environmental audit report to the competent authority (in this case, the DFFE) at intervals as indicated in the EA, and including the contents specified in Appendix 7 of the NEMA EIA Regulations 2014 (as amended).

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

Appendix 7 of the NEMA Regulations requirement	Corresponding section in this audit report
(1) Provide recommendations regarding the need to amend the EMPr;	Section 4
(2a) Report on the level of compliance with the conditions of the EA and the EMPr and the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr;	Section 3
(2b) Identify and assess any new impacts and risks as a result of undertaking the activity;	Section 4
(2c,d) Evaluate the effectiveness of the EMPr and any shortcomings;	Section 4
(2e) Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.	Section 4
(3.1 a) contain the details of the independent person who prepared the environmental audit report and their expertise;	Section 6
(3.1 b) declaration that the independent auditor is independent;	Section 6
(3.1 c) indication of the scope of, and the purpose for which, the environmental audit report was prepared;	Section 1
(3.1 d) description of the methodology adopted in preparing the audit report;	Section 2
(3.1 e) indication of the ability of the EMPr to sufficiently provide for the avoidance, management and mitigation of the environmental impacts associated with the undertaking of the activity on an ongoing basis and the closure of the facility and ensure compliance with the provisions of the EA and EMPr	Section 4
(3.1 f) a description of any assumptions made, and any uncertainties or gaps in knowledge;	Section 1.3
(3.1 g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;	Section 2
(3.1 h) summary and copies of any comments that were received during any consultation process; and	n/a

(3.1 i) any other information required by the competent authority.	EA Conditions and EMPr requirements described in section 1.2.1
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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 DFFE within the required time frames.

1.3 ASSUMPTIONS AND LIMITATIONS

Assumptions are:

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

Limitations to the study are:

- This audit is undertaken in terms of Regulation 34 of the Environmental Impact Assessment Regulations, 2014 (as amended). It is not a full legal compliance audit of all applicable environmental legislation. The scope is restricted to assessing compliance with the Environmental Authorisation (EA) conditions and Environmental Management Programme (EMPr) requirements relevant to this project and applicable to the phase of work undertaken during this audit period.
- The audit period covers the time since the commencement of project activities, or the previous audit (where applicable), up to the date of this audit. Findings are therefore based on both conditions observed during the audit inspection and records of environmental performance over the audit period.
- As the audit inspection represents a single point in time, it cannot directly verify the management of all activities or capture contraventions that were not observable or documented.
- The audit findings and conclusions are based on the auditor's observations and on information provided by project personnel. This information has been assumed to be correct. Wherever possible, verification was undertaken through visual inspection or review of supporting documentation. The auditor cannot be held responsible for findings or conclusions resulting from inaccurate or incomplete information, or from information withheld or not made available during the audit.

2 METHODOLOGY

2.1 Approach

The audit assessed compliance with the conditions of the Environmental Authorisation (EA) and the applicable requirements of the approved Environmental Management Programme (EMPr) during the audit period, extending from the commencement of the authorised activities to 25 June 2026. The applicable EA conditions and EMPr requirements were tabulated in the audit checklists presented in Section 3. Each requirement was assessed using the documentary evidence provided, observations made during the site inspection and information obtained through discussions with the project environmental representatives.

The site inspection was undertaken on 25 June 2026 by the independent environmental auditor, Christine Rabie. The inspection was attended by the project Environmental Control Officers, Tom Smyth and Olivia Murgatroyd of Infinity Environmental, and the Contractor's Environmental Officer, Ms Nandipha Dhlamini of Empa Structures (Pty) Ltd.

The following principal sources of information and audit evidence were considered:

- **Environmental Authorisation**, Ref. 14/12/16/3/3/1/3021, issued on 18 March 2025;
- **Environmental Management Programme**, dated November 2024, and amended EMPr Revision 01 dated May 2026, incorporating revised Figures 2 and 4;
- **Notification of Commencement**, Infinity 13 March 2026;
- **Water-use Registration**;
- **Approved layout plan**, HHO-220102-700-1000 (appendix G1 of the final BAR November 2024);
- **Monthly ECO reports** for April, May and June 2026 (Infinity);
- **Contractor's environmental method statements**, including those addressing site establishment, ablution facilities, waste management, environmental awareness training, hydrocarbon spill response, contaminated-water management, hazardous-material management, works within waterways, dewatering and flow diversion, control of access for hippopotamus and fire management;
- **Contractor's Waste Management Plan**, waste register guideline and Solid Waste Management Method Statement;
- **Incident investigation report** for the hydraulic-oil spill recorded during June 2026;
- **Environmental induction and awareness-training records**;
- **Registers and records** - communication, hazardous-substance, waste-disposal, non-conformance and environmental incident registers, safety data sheets, spill-kit inspection records, weekly environmental inspection checklists and ablution-servicing records;
- **Observations and photographic evidence** obtained during the audit inspection; and
- **Interview, discussions and correspondence** with the ECOs and the Contractor's Environmental Officer;
- **Water Quality Monitoring Report, July 2026** (Infinity Environmental), received post-audit.

2.2 Assessment and classification

Compliance was assessed against the environmental outcome required by each EA condition or EMPr requirement. The assessment considered whether that outcome had been achieved and whether any procedural or implementation gap had materially increased environmental risk, resulted in an environmental impact or undermined the effectiveness of the relevant mitigation measure.

A procedural omission was not regarded as substantive non-compliance where the required outcome was achieved, and the omission did not materially increase environmental risk. Recommendations were made only where a specific action was required to address an identified gap or reduce a material environmental risk.

The completed audit checklists provide the evidence considered, compliance classification, audit findings and, where necessary, the recommended corrective or improvement action. As this was the first external compliance audit for the project, there were no findings from a previous external audit requiring close-out.

3 COMPLIANCE AUDIT

3.1 Compliance Checklist: Notes and key to compliance columns:

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

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

Non-compliant = 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 because 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.

Partially Compliant = 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-compliant.

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

The completed Compliance Checklist of findings follows:

3.2 Compliance Audit Findings:

3.2.1 Compliance with the Conditions of the Environmental Authorisation

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
1.	The re-development of the Zeekoevlei and Rondevlei Weir Complex, False Bay Nature Reserve, City of Cape Town Metropolitan Municipality, Western Cape Province as described above, are hereby approved as per the geographic coordinates cited in the tables above.	COMPLIANT	The authorised redevelopment of the Zeekoevlei Weir was under construction during the audit period. The approved layout plan was provided, and the ECO reports and audit inspection indicated that the works were being undertaken within the approved project area.
2.	Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.	NOTED	The binding nature of the conditions of the Environmental Authorisation is noted.
3.	The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation.	COMPLIANT	The 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.
4.	The activities authorised must only be conducted at the property as described above.	COMPLIANT	The approved layout plan was provided. The ECO reports recorded that construction activities were confined to the defined works areas and approved access routes, with no unauthorised work outside the authorised project area identified during the audit period. This was confirmed during the audit inspection.
5.	Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.	N/A	No changes or deviations from the authorised project description were reported or identified during the audit period. The revision of Figures 2 and 4 of the EMPr to provide for a larger temporary working area did not change the authorised development scope and is addressed under Condition 16 below. The requirement to obtain approval for a deviation from the authorised project description was therefore not triggered.
6.	The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.	N/A	No alienation, transfer or change in ownership rights affecting the authorised property was reported during the audit period. The requirement was therefore not triggered.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
7.	This activity must commence within a period of ten (10) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.	COMPLIANT	The Environmental Authorisation was issued on 18 March 2025, and project establishment commenced in April 2026. The activity therefore commenced within the authorised ten-year period.
8.	Construction must be completed within five (05) years of the commencement of the activity on site. The continuation of any such activities after the above-mentioned period has lapsed may trigger one or more listed and/or specified activities, including activity 32 of Listing Notice 1. Such continuation without the required Environmental Authorisation will constitute an offence or offences in terms of section 49A(1)(a) read with section 24F(1)(a) of National Environmental Management Act (NEMA).	COMPLIANT	Construction commenced in April 2026 and remained in progress at the time of the audit inspection on 25 June 2026. The project was therefore operating within the five-year construction period allowed by the Environmental Authorisation.
9.	Commencement with one activity listed in terms of this Environmental Authorisation constitutes commencement of all authorised activities.	NOTED	Construction activities have commenced.
10.	The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.	COMPLIANT	Registered interested and affected parties were notified of the Environmental Authorisation on 19 March 2025, one day after the Environmental Authorisation was issued and within the required 14-day period. The distribution report records that the notification was sent to 49 recipients.
11.	The notification referred to must –11.1. specify the date on which the authorisation was issued;11.2. inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014; 11.3. advise the interested and affected party that a copy of the authorisation will be furnished on request; and 11.4. give the reasons of the Competent Authority for the decision.	COMPLIANT	The notification identified the date of the Environmental Authorisation, provided access to the decision and reasons, described the appeal procedure and submission period, and included the relevant contact details. The notification therefore contained the information required by this condition.
12.	The authorised activity must not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged	COMPLIANT	Interested and affected parties were notified of the decision on 19 March 2025. Site establishment commenced in April 2026, well after the prescribed appeal period had elapsed. No appeal or suspension of the Environmental Authorisation was reported or identified in the supplied records.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
	you may not commence with the activity until such time that the appeal has been finalised.		
13.	The layout plan for the re-development of the Zeekoevlei and Rondevlei Weir Complex attached as "ZeekoevleiWeir_AppendixG1_LayoutPlan.pdf" in the final BAR dated November 2024 is approved.	COMPLIANT	The approved layout plan was provided. At the time of the audit, construction was limited to the Zeekoevlei phase, which forms part of the current contract. The ECO reports and audit inspection indicated that the works were being undertaken within the approved development area.
14.	The Environmental Management Programme (EMPr) submitted as part of the final BAR dated November 2024 is approved and must be implemented and adhered to.	COMPLIANT	The approved November 2024 EMPr was implemented during the construction phase. An amended EMPr, Revision 01 dated May 2026, incorporating revised Figures 2 and 4 to provide for a larger temporary working area, was provided. Implementation of the EMPr was monitored through the April, May and June 2026 ECO inspections and reports.
15.	The EMPr must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.	COMPLIANT	The EMPr was being implemented through the contractor's environmental management system, environmental method statements, environmental awareness training, daily oversight by the designated Environmental Officer and regular ECO inspections. Environmental Specifications, as contained in the construction contract document, were viewed in the environmental site file.
16.	Changes to the approved EMPr must be submitted in accordance with the EIA Regulations applicable at the time.	COMPLIANT	The EMPr was amended during the audit period by revising Figures 2 and 4 to provide for a larger temporary working area. No change was made to the approved impact management outcomes, the authorised development scope or the environmental mitigation requirements applicable to the works. The ECO advised that the amendment would be processed in terms of Regulation 36(1) of the Environmental Impact Assessment Regulations, 2014, as amended, as the amendment is limited to an impact management action and does not amend an approved impact management outcome. The auditor reviewed the amendment and is satisfied that it does not introduce a new environmental impact or materially increase the environmental risks associated with the authorised activity. The amendment is therefore supported. The amended EMPr is submitted with this audit report for the Department's notification and records.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
17.	The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the BAR be discovered.	NOTED	Noted.
18.	The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 25 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the Environmental Authorisation or EMPr.	N/A	No further update to the EMPr was identified as necessary through this audit. The requirement for an updated EMPr to contain recommendations addressing audit shortcomings was therefore not triggered.
19.	The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.	N/A	
20.	The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of the EIA Regulations, 2014 as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.	NOT YET REQUIRED	This audit did not identify a need for a further audit-driven update to the EMPr. The requirement to submit an updated EMPr for approval under Regulation 34, together with an associated public participation process, was therefore not triggered. The separate amendment to Figures 2 and 4 is addressed under Condition 16.
21.	The Department will consider the process prescribed in Regulation 35 of the EIA Regulations, 2014, as amended, in assessing whether to grant approval of an EMPr which has been updated because of an audit. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.		
22.	The holder of the authorisation must apply for an amendment of an EMPr if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of the EIA Regulations, 2014, as amended. The holder of the authorisation must request comments on the proposed amendments to the impact management outcomes of the EMPr or amendments to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.		

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
23.	The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction/implementation phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this Environmental Authorisation are implemented and to ensure compliance with the provisions of the approved EMPr. 23.1 The ECO must be appointed before commencement of any authorised activities. 23.2 Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department. 23.3 The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO. 23.4 The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.	COMPLIANT	Infinity Environmental was appointed as ECO prior to, and for the duration of the construction phase to date, represented by Tom Smyth and Olivia Murgatroyd. Regular inspections were undertaken and the ECO reports recorded construction activities, environmental performance, shortcomings and corrective actions. The ECO's name and contact details were submitted to the Director: Compliance Monitoring as required, in the Notification of Commencement.
24.	All documentation, e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this Environmental Authorisation, must be submitted to the Director: Compliance Monitoring of the Department.	COMPLIANT	The Notification of Commencement was submitted to the Director: Compliance Monitoring, and this first external environmental audit report is being compiled for submission to the Director.
25.	The holder of the Environmental Authorisation must, for the period during which the Environmental Authorisation and EMPr remain valid, ensure that project compliance with the conditions of the Environmental Authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department.	COMPLIANT	The holder appointed an independent environmental auditor to undertake this first external audit of compliance with the EA and EMPr. The audit inspection was undertaken on 25 June 2026, and this report has been compiled for submission to the Director: Compliance Monitoring.
26.	The frequency of auditing and of submission of the environmental audit reports must be as indicated in the EMPr, considering the process for such auditing prescribed in Regulation 34 of the EIA Regulations, 2014, as amended.	COMPLIANT	The EMPr requires the first external audit to be undertaken three months after commencement of construction. Construction commenced in April 2026, and the first audit inspection was undertaken on 25 June 2026. The audit was therefore undertaken within the prescribed initial audit period.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
27.	The holder of the Environmental Authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction/implementation phase and a final environmental audit report within 30 days of completion of rehabilitation activities.	NOT YET REQUIRED	Construction and rehabilitation had not been completed at the time of the audit. The requirements for an audit report within 30 days of site handover and a final audit report within 30 days of completion of rehabilitation were therefore not yet applicable.
28.	The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014, as amended, and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the Environmental Authorisation conditions as well as the requirements of the approved EMPr.	COMPLIANT	This audit report has been compiled in accordance with Appendix 7 of the EIA Regulations, 2014, as demonstrated in Section 1.2.2 of this report.
29.	Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	COMPLIANT	An environmental site file was maintained and made available for review. The ECO reports recorded that the file contained the relevant environmental approvals, method statements, training records, registers and monitoring documentation. This was confirmed during the audit inspection.
30.	A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.	COMPLIANT	Written notification of commencement was submitted to the Department on 13 March 2026, identifying the anticipated commencement date as 28 March 2026 and including DFFE Reference 14/12/16/3/3/1/3021. The notification was submitted at least 14 days before the scheduled commencement date. The notification also included proof of compliance with conditions 10 and 11 of the EA.
31.	A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the operational phase of the activity.	NOT YET REQUIRED	The project remained in the construction phase at the time of the audit. Notification before the commencement of the operational phase was therefore not yet required.
32.	Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant Competent Authority.	NOT YET REQUIRED	The authorised activity had not ceased or become redundant. The requirements relating to cessation or redundancy were therefore not applicable during the audit period.
33.	The construction footprint must be kept to a minimum and clearly demarcated prior to commencement of construction.	COMPLIANT	The active construction footprint, no-go areas and approved access routes were agreed with FBNR and the ECO and demarcated before work commenced in each area. Supplementary demarcation was completed during April 2026 and was fully in place by May 2026. Construction remained within

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
			the defined works areas, and no unauthorised vegetation clearing or disturbance was recorded.
34.	Should any protected plant species require removal or translocation, the necessary permit(s) must be obtained from the relevant competent authority prior to such removal or translocation.	N/A	Plant search and rescue was undertaken by False Bay Nature Reserve before vegetation clearing, with rescued plants retained for rehabilitation where practicable. No removal or translocation of a TOPS-listed, Red Data-listed or nationally protected plant species requiring a permit was reported. The permitting requirement was therefore not triggered.
35.	Only indigenous plant species must be used for rehabilitation and landscaping purposes. No alien or invasive plant species may be introduced.	NOT YET REQUIRED	Rehabilitation had not commenced at the time of the audit. The requirement to use only locally appropriate indigenous species will become applicable during rehabilitation.
36.	All disturbed sandy areas must be rehabilitated using locally indigenous Cape Flats Dune Strandveld species propagated from local genetic material where reasonably possible.	NOT YET REQUIRED	Construction was ongoing and final rehabilitation had not commenced. Topsoil was being retained separately for later use, and the ECO confirmed that a rehabilitation plan would be prepared closer to construction completion.
37.	The disturbed banks of the Big Lotus River, extending approximately 30 m upstream and 50 m downstream of the weir, must be reshaped to resemble a natural riverine system with side slopes no steeper than 1:3 and stabilised through appropriate rehabilitation measures.	NOT YET REQUIRED	Construction of the Zeekoevlei phase remained underway, and final shaping and rehabilitation of the disturbed channel banks had not yet become due. Compliance with the specified bank profile, slope and stabilisation requirements must be assessed during the construction-completion and rehabilitation audits.
38.	Water hyacinth must be removed from the Big Lotus River and associated channels at least every six (6) months, or more frequently if required, to maintain the hydraulic functioning of the system.	NOT YET REQUIRED	Construction commenced in April 2026, and the first six-month maintenance interval had not been reached at the time of the audit. The requirement to verify the removal of water hyacinth from the Big Lotus River and associated channels will be assessed during subsequent audits.
39.	Debris, litter and accumulated sediment must be removed from the fishways and low-flow channels at least every six (6) months, or more frequently if required, to maintain their functionality.	NOT YET REQUIRED	
40.	Water hyacinth and other alien invasive plant species must be controlled and removed from the development area at least every six (6) months, or more frequently if required.	NOT YET REQUIRED	

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
41.	Should any archaeological material, heritage resources or graves be uncovered during construction, all work in the immediate vicinity of the find must cease immediately and the South African Heritage Resources Agency (SAHRA) or relevant heritage authority must be notified. Work may only recommence once the relevant authority has granted approval.	N/A	No archaeological material, heritage resources or graves were reported encountered during the audit period, and the notification requirement was therefore not triggered.
42.	Drainage measures associated with the development must allow for the continuation of natural surface and subsurface water flows and promote the dissipation of stormwater without causing erosion or downstream impacts.	COMPLIANT	The Zeekoevlei works were implemented in accordance with the approved layout and were monitored by the ECO for erosion, sedimentation and interference with water flow. No project-related obstruction of natural flow, erosion or downstream drainage impact was recorded during the audit period or during the audit inspection. Water had only recently begun flowing over the weir.
43.	The mitigation measures contained in the Final Basic Assessment Report dated November 2024 and all specialist reports submitted in support of the application must be implemented unless otherwise amended or superseded by this Environmental Authorisation.	COMPLIANT	The ECO confirmed that the applicable mitigation measures contained in the Final BAR and specialist reports were incorporated into the approved EMPr. Compliance with these measures was assessed through the EMPr compliance audit in Section 3.2.2.
44.	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal. Any waste generated must be disposed of at a facility authorised to accept that waste.	COMPLIANT	The contractor had prepared a Waste Management Plan and approved Solid Waste Management Method Statement. General waste was separated, temporarily stored and removed regularly, with a waste register maintained in the environmental file. Following the hydraulic-oil spill on 12 June 2026, the spill was contained and the contaminated soil and used spill materials were collected for disposal as hazardous waste.
45.	The recommendations and mitigation measures contained in the Final Basic Assessment Report dated November 2024 and all specialist studies form part of this Environmental Authorisation unless otherwise amended by this Environmental Authorisation. Where there is any conflict between the Environmental Authorisation and the specialist reports, the Environmental Authorisation shall prevail.	COMPLIANT	The applicable recommendations and mitigation measures contained in the Final BAR and specialist reports were incorporated into the approved EMPr. Compliance with these measures was assessed through the EMPr compliance audit in Section 3.2.2. No conflict between the Environmental Authorisation and the specialist recommendations was identified during the audit period.
46.	A copy of this Environmental Authorisation, the approved Environmental Management Programme (EMPr), environmental audit reports and compliance monitoring reports must be kept at the site of the authorised activity and	COMPLIANT	An environmental site file containing the relevant environmental approvals, EMPr, method statements, registers and compliance-monitoring records was maintained on site and was available for review during the audit.

AUDIT ITEM/ Condition	CONDITION	COMPLIANCE	COMMENTS
	made available for inspection by any authorised official of the competent authority.		
47.	The National Government, Provincial Government, Local Authority or any organisation or committee appointed in terms of the conditions of this Environmental Authorisation shall not be held responsible for any damages or losses suffered by the holder of the Environmental Authorisation in any instance where construction or operation is temporarily or permanently stopped owing to non-compliance with the conditions of this Environmental Authorisation or any other legal requirement.	NOTED	The provision relating to liability for losses arising from the temporary or permanent cessation of work due to non-compliance is noted.

3.2.2 Compliance with the Requirements of the Environmental Management Programme

ITEM	EMPR REF	AUDIT CRITERIA	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 listed in this checklist). It is noted that actions or methods in the EMPr may be amended where required to practically and effectively achieve the approved outcomes, subject to the applicable amendment provisions of the EIA Regulations. Amendments to approved impact management outcomes require the applicable formal amendment process.				
GENERAL MANAGEMENT & ADMINISTRATION				
1.	EMP 3.2/ 5.1	Outcome: An Environmental Control Officer (ECO) is appointed for the duration of the construction phase to oversee and monitor implementation of the EMPr and compliance with the Environmental Authorisation. - Periodic environmental inspections undertaken at a frequency determined by the ECO (minimum monthly). - Meet with the Contractor prior to construction to confirm development areas, no-go areas and environmental controls. - Required Method Statements reviewed prior to commencement of relevant activities. - Contractors provided with environmental awareness training. - Corrective actions identified and monitored where environmental non-conformances occur. - EMPr amendments identified and recommended where appropriate. (Construction completion inspection undertaken and close-out report prepared following completion of construction.) (Final audit only.)	COMPLIANT	An ECO (Infinity) has been appointed for the duration of the construction phase. Five ECO visits were undertaken in April 2026, two in May and one was recorded in the June report, exceeding the minimum monthly inspection frequency. The ECO reviewed the required environmental method statements, monitored implementation of the EMPr, identified corrective actions and followed up on environmental performance through monthly reports. All MS required at the time of the audit were in place (per the environmental site file viewed and per the MS register attached to the ECO reports). Copies of the ECO compliance/recommendations reports for April - June 2026 were provided to the auditor. The construction-completion inspection and close-out report was not yet due.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
2.	EMP 3.3/ 5.2	Outcome: Contractor environmental responsibilities are implemented throughout the construction phase. - 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. - Environmental site file maintained, including current environmental approvals and records (refer EA Item 24).	COMPLIANT	Environmental awareness inductions and toolbox talks have continued throughout the construction period, as verified by the content and attendance registers viewed in the environmental site file. Ms Nandipha Dhlamini has been designated as the Contractor's Environmental Officer (EO) and is responsible for monitoring and reporting on the contractor's day-to-day environmental activities on site. Environmental file, administration and record-keeping were found to be in good order at the time of the audit.
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
3.	EMP 4.1 General Provisions and Method Statements	Outcome: Construction activities are managed in a site-specific manner and methods are documented and approved in advance to minimise impact and risk to the environment. - Minimum EMPr-required Method Statements, together with any additional Method Statements required for activities posing a significant environmental risk, are prepared, approved prior to commencement, communicated to relevant personnel and implemented on site. - Method Statements are amended and re-approved where work methods change.	COMPLIANT	The contractor submitted method statements for the activities undertaken during the audit period. The ECO reports confirmed that the method statements required at the relevant stages had been provided, reviewed and recommended for approval. Approved method statements were retained on site, and revisions were submitted where work methods changed.
4.	EMP 4.2 Loss of indigenous vegetation in an endangered ecosystem and within a nature reserve	Outcome: The loss of Dune Strandveld vegetation within the site footprint is minimised as far as practically possible. Works areas, no-go areas and approved access routes clearly demarcated and signposted prior to vegetation clearing and maintained throughout construction.	COMPLIANT	Works areas, no-go areas and approved access routes were agreed with FBNR and the ECO. All required demarcation and signage were in place at the time of the audit. Supplementary demarcation and signage were completed during site establishment in April 2026 and confirmed to be fully in place by May 2026. Vegetation clearing was restricted to approved works areas, and no unauthorised clearing or disturbance outside the project footprint was recorded.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
		- No unauthorised vegetation clearing or disturbance outside approved works areas. - No ad hoc crossing of watercourses by construction vehicles.		
5.		Outcome: To salvage and reinstate indigenous vegetation and seeds from the site footprint. - Search and rescue of translocatable indigenous vegetation undertaken where required. - Topsoil stripped and separately stockpiled at a maximum height of 1 m, and maintained to minimise erosion and preserve the seedbank. - Salvaged indigenous vegetation and topsoil/seedbank used in rehabilitation where applicable.	COMPLIANT	False Bay Nature Reserve undertook plant search and rescue before vegetation clearing. Rescued plants were retained in a City nursery/off-site. Topsoil was separately stockpiled for later rehabilitation, as confirmed on site. The detailed plant search-and-rescue records by FBNR were not made available for this audit.
6.		Outcome: Disturbed areas within the project footprint are rehabilitated with locally indigenous vegetation on completion of works - Rehabilitation Plan prepared by suitably experienced person and implemented, with disturbed Dune Strandveld areas, site camp and laydown areas rehabilitated using locally indigenous vegetation to restore the disturbed areas to its pre-impacted condition or better (to satisfaction of FBNR management). - April/May rehab timing preferable; exposed areas stabilised if needed until rehabilitation commences.	NOT YET REQUIRED	Construction was ongoing, and rehabilitation of the disturbed works areas, site camp and laydown areas had not yet become due. Topsoil was being retained for later rehabilitation, and the rehabilitation plan will be prepared closer to construction completion.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
7.	EMP 4.3 Impacts of alien invasive plants	Outcome: Ensure the appropriate control of alien invasive vegetation within the works areas and prevent the establishment and spread of alien invasive plants due to the project activities. • Alien invasive plants within the project footprint controlled using appropriate control measures. • Imported topsoil confirmed free of excessive invasive alien seed matter. • Follow-up alien invasive plant control undertaken during the rehabilitation establishment and maintenance period (prior to final completion of rehabilitation).	COMPLIANT	No excessive alien invasive vegetation or project-related spread of alien plants was recorded within the works area during the audit period. No imported topsoil was reported, and salvaged site topsoil was retained separately for rehabilitation. Follow-up alien plant control during rehabilitation establishment was not yet required.
8.	EMP 4.4 Impact to terrestrial fauna on site from construction activities	Outcome: Minimise disturbance and mortality of animals. • Reserve management contact details displayed on site, with all fauna relocations undertaken in consultation with reserve management and recorded in a register. • Open excavations and trenches minimised, inspected daily, with trapped fauna relocated where required and inspections/relocations recorded in a register. • Hippo exclusion measures implemented in accordance with an approved Method Statement. • Terrestrial fauna awareness training completed prior to construction and before personnel commence work on site.	COMPLIANT	No terrestrial fauna mortality or unauthorised handling was recorded during the audit period. Hippo-warning signage and exclusion measures were strengthened following the April ECO inspection, and the temporary hippo fence was extended in consultation with reserve management. However, the required excavation and fauna inspection register was not being completed regularly at the time of the June ECO report. Since the outcome was met, this audit item is rated as generally compliant, but the recommended improvement action must be implemented. Recommendation a) Complete the excavation and fauna inspection register daily whenever open excavations or trenches are present, including confirmation of inspections and details of any fauna relocations.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
9.	EMP 4.5 Impacts of construction activities on aquatic fauna	Outcome: Avoid trapping and mortality of aquatic vertebrates. - Prohibition on the catching of fish and other aquatic fauna communicated to all site personnel. - Works areas are inspected daily during flow diversions and cofferdam installation, with trapped aquatic fauna relocated by the ECO or reserve management and inspections/relocations recorded in the fauna register.	COMPLIANT	No catching, trapping or mortality of fish or other aquatic fauna was recorded during the audit period. The ECO reports confirmed that no aquatic fauna incidents were identified during the inspected construction activities, and no relocation events were reported. However, dedicated records confirming the routine aquatic fauna inspections during in-stream works were limited. As the required environmental outcome was achieved and there was no evidence of environmental harm or increased environmental risk, this audit item is rated as Compliant. The recommended improvement action should nevertheless be implemented. Recommendation b) Complete the daily fauna inspection register during flow diversions and cofferdam installations, including confirmation of inspections and details of any fauna relocations.
10.	EMP 4.6 Erosion and sedimentation due to construction in and around watercourses	Outcome: Minimise the effects of erosion and sedimentation on the vleis, downstream watercourses and adjacent terrestrial areas. - Bulk earthworks scheduled to avoid major flow/rainfall events and annual drawdown periods. - Appropriate erosion and sediment control measures implemented, maintained and adapted where required, in accordance with the approved Method Statement. - Regular turbidity monitoring undertaken during in-stream works, with results recorded and management measures adapted where turbidity exceeds 70 NTU above background levels.	COMPLIANT	No evidence of uncontrolled sediment discharge, cement-contaminated runoff or construction-related turbidity affecting downstream environments or adjacent terrestrial areas. Temporary cofferdams, sandbags and lined barriers were used to isolate the working area from the waterbody. At the time of the audit, the water level had only recently risen sufficiently for water to overtop the existing weir. Before this occurred, the concrete works were undertaken within a dry, isolated working area and there was no contact between the construction works and the waterbody. Accordingly, construction-related water-quality monitoring had not previously been triggered. Monitoring was initiated following the recent overtopping; however, the results were not yet available for review at the time of the audit inspection. [Post-audit note: Water-quality monitoring was undertaken by the ECO on 1 July 2026, following the audit inspection. At Site 1, the highest recorded turbidity was 60.2 NTU compared with a

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
				background value of 28.7 NTU, representing an increase of approximately 31.5 NTU and therefore remaining below the EMPr threshold of 70 NTU above background. The highest pH recorded was 9.3 compared with a background pH of 8.6. These elevated readings were obtained from a small, contained waterbody within the bunded working area adjacent to active concrete works and were considered representative of a worst-case condition. Site 2 showed no apparent construction-related water-quality impact. Safe downstream sampling of the canal could not be undertaken due to high flows. The ECO advised that alternative monitoring equipment would be used to obtain downstream measurements during future monitoring. The results support the effectiveness of the existing containment measures, but continued upstream, impact-area and downstream monitoring is required while concrete works may affect surface water.] Recommendation: c) Continue and record pH and turbidity monitoring whenever concrete works or other construction activities may affect surface water. Monitoring should include suitable upstream/background, impact-area and downstream points. Results must be assessed against the applicable EMPr thresholds, and controls must be reviewed and adapted if elevated readings or downstream impacts are identified.
11.		Outcome: Avoid sedimentation of watercourses and adjacent terrestrial areas due to dewatering activities Appropriate dewatering measures implemented, with sediment controlled and discharge confined to approved areas in accordance with the approved Method Statement.	COMPLIANT	Dewatering and temporary water-management activities did not result in visible pollution or sediment-laden discharge to the surrounding water environment. Method statements addressing dewatering, contaminated water management, flow diversion, and temporary infrastructure within waterways were available in the site environmental file. The construction area was isolated using temporary cofferdams and lined barriers. No uncontrolled discharge of contaminated or sediment-laden water was observed during the audit.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
12.	EMP 4.7 Aquatic habitat fragmentation and alteration	Outcome: Disturbed watercourse areas are rehabilitated to restore natural habitat and ecological function. - Disturbed Zeekoe Channel banks reprofiled to stable, naturalistic slopes (maximum 1:3) from 30 m upstream of the new fish ladder to at least 50 m downstream, and rehabilitated using locally indigenous plant species approved by FBNR. - Rehabilitation maintained to achieve a minimum of 80% cover of locally indigenous, high-diversity vegetation.	NOT YET REQUIRED	The required outcome was not yet applicable because the downstream fishway and channel works and the associated rehabilitation had not yet commenced.
13.	EMP 4.8 Concrete and Cement Works	Outcome: Concrete and cement works do not pollute soil, watercourses or the surrounding environment. - Ready-mix concrete used in preference to on-site batching where practicable. - Concrete mixing undertaken only in designated impermeable areas, in accordance with the approved Method Statement. - Bagged cement stored in a weatherproof area. - No cement-contaminated wash water discharged to watercourses. - Hardened concrete from washout facilities appropriately reused or lawfully disposed of. - Empty cement bags dampened and securely stored prior to disposal. - Concrete adequately cured before flows are directed over completed works. - pH monitoring undertaken upstream and downstream of in-stream concrete works, with results recorded and corrective actions implemented where required	COMPLIANT	Concrete works did not result in visible cement contamination, alkaline runoff or pollution of the adjacent water environment outside of the contained work area. Concrete works were undertaken within the demarcated and isolated construction footprint. No uncontrolled empty cement bags, batching areas or concrete spills were observed during the audit inspection. Before the water level rose sufficiently to overtop the weir, the works were undertaken under dry conditions without contact between the waterbody and the concrete works. Temporary cofferdams and lined barriers were in place following the rise in water level. No cement-contaminated runoff, concrete residue or uncontrolled wash water was observed entering the surrounding or downstream environment. Refer to the water-quality monitoring recommendation under Item 10.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
14.	EMP 4.9 Contamination of soils, groundwater and watercourses, and risk of damage to vegetation and/or fauna through spillage of fuels, oils and other hazardous substances	Outcome: Prevent and mitigate the impacts of any spills and/or leaks of hazardous substances used on site. - Hazardous substances stored in designated, signposted, bunded areas on impervious surfaces with a minimum 110% bund capacity. - Construction vehicles and plant regularly inspected for leaks, with drip trays used where required. - Appropriately stocked spill kits available at the site camp and active work areas, with personnel trained in spill response procedures. - Hazardous substance spills immediately contained and cleaned up, with contaminated material lawfully disposed of and disposal records retained.	COMPLIANT	Hazardous substances were managed without causing soil contamination or pollution of the adjacent water environment. Hazardous substances were stored in a designated, labelled and bunded/tray storage locker. A larger brick bunded storage area was constructed for future use. Spill kits and drip trays were available at the site office and active work areas. The hydraulic-oil spill on 12 June 2026 was contained, cleaned up, investigated and recorded, with no impact on the adjacent watercourse reported. Refer to the recommendation in audit item 17 regarding obtaining confirmation of lawful disposal of contaminated cleanup material. No active leaks, spills or residual contamination were observed during the audit.
15.		Outcome: Appropriate record keeping and reporting in respect of dangerous goods and any incidents is maintained. - Hazardous substance register maintained on site, including current Safety Data Sheets. - Hazardous substance spills and incidents recorded, reported to the ECO and relevant authorities where required.		Environmental inspections, incidents, training and compliance activities were documented and available for review. The environmental file included the hazardous-substance register, applicable safety data sheets, induction and environmental-awareness registers, spill-kit inspection records, weekly environmental checklists, waste records and the environmental incident register. The hydraulic-oil spill was supported by an investigation report describing the incident, response and corrective actions.
16.	EMP 4.10 Pollution due to construction sanitation	Outcome: Avoid any impacts on watercourses and vegetation due to inappropriate or inadequate construction sanitation. - Regularly serviced ablution facilities provided at the site camp and all active work areas as far as practicably possible from watercourses. - No pollution of soil, vegetation or watercourses from construction sanitation facilities.	COMPLIANT	Adequate sanitation facilities were provided without causing sewage leakage or contamination of the surrounding environment. Sufficient portable toilets were provided within the demarcated construction area. Servicing records confirmed that the toilets were regularly serviced during April and May 2026. No leaking, overflowing or poorly maintained sanitation facilities were observed during the audit.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
17.	EMP 4.11 Solid waste generation and disposal into the estuarine and freshwater and terrestrial environments	Outcome: Manage waste in accordance with legislation and best practice methods; minimise production of general waste; prevent pollution or contamination due to improper handling on site. - Waste management plan in place - Designated waste area (roofed hardstanding, or lidded bins/skips); daily litter/waste collection - Waste streams separated – hazardous/ general /recyclable; food waste in secure, animal-proof bins - Hazardous & general waste disposal records/register; waybills on file - Registered waste contractor appointed - Storage volumes within 80 m³ (hazardous)/100 m³ (general), or GN 926 compliance	COMPLIANT	Waste was contained and regularly removed without causing visible littering or pollution. A waste-management plan and solid-waste method statement were available. Labelled, lidded waste bins were provided at the site office, and a waste-disposal register recorded the regular removal of general and vegetation clearing waste. The site office, laydown area and active construction area were generally clean and well organised. Proof of the lawful disposal of the material contaminated during the hydraulic-oil spill clean-up recorded in audit item 14 was not yet available at the time of the audit. As waste was otherwise appropriately contained and managed and no pollution resulted, the required environmental outcome was achieved; however, the recommended disposal-record action must be completed. Recommendation: d) Obtain and retain proof of the lawful disposal of the contaminated material generated during the hydraulic-oil spill clean-up.
18.	EMP 4.12 Spoil and Material Handling	Outcome: Comply with environmental legislation regarding the disposal of waste, including construction waste and spoil. - Potential spoil sites identified prior to offsite disposal - Spoil disposal compliant with NEMA & NEM:WA	COMPLIANT	Spoil, excavated material and topsoil were managed without visible encroachment into sensitive areas or pollution of the surrounding environment. Excavated material was retained within the approved construction footprint. Topsoil was separately stockpiled in an approved location for later use during rehabilitation. No uncontrolled dumping of spoil or disposal within the adjacent watercourse was observed.
19.	EMP 4.13 Fires	Outcome: Prevent damage to terrestrial vegetation or property due to wildfires and prevent the start or spread of wildfires in the site footprint. - Smoking confined to designated site camp area - Firefighting equipment on site and at work areas - High-risk activities restricted on extreme fire-danger days	COMPLIANT	Fire-prevention and emergency-response measures were in place, and no fire incidents were recorded during the audit period. A fire-management method statement was available in the site environmental file. Fire extinguishers were provided at the site office, hazardous-substance storage area and active work areas. No-smoking and emergency signage was displayed, and no evidence of open fires or burning of waste was observed.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
20.	EMP 4.14 Dust	Outcome: Prevent wind erosion and resultant dust impacts on surrounding area. - Vegetation clearing limited/phased; exposed soil minimised - Erodible loads covered; no transport in high winds - Exposed soils/ stockpiles stabilised (wetting/ vegetation/ chemical) - Access/haulage roads of dust-suppressing material - Off-road vehicle movement minimised; speed limits enforced	COMPLIANT	Construction activities did not generate excessive or uncontrolled dust during the audit. The access routes and working areas were generally stable, and no visible dust plume was observed leaving the construction footprint. No dust-related complaints were recorded or reported for the audit period. The dust risks are low during the winter wet season.
21.	EMP 4.15 Security	Outcome: Prevent adverse impacts to construction equipment that could extend the construction phase. Security measures/guards in place	COMPLIANT	Access to the construction footprint and environmentally sensitive areas was effectively controlled. The site office, laydown area and active construction areas were demarcated using fencing, gates, warning signs and temporary barrier netting. No-go areas were identified, and fencing and hippo-control measures restricted access by people and large fauna to the active works.
22.	EMP 4.16 Conflict with Recreational Uses and Adjacent Residential Areas	Outcome: Minimize the disturbance and inconvenience to recreational users and reserve staff. - Works timed/located to avoid recreational disruption and clashes with other projects, e.g. dredging of Zeekoevlei) - Contact details posted at site entrance - Complaints register maintained; ECO review of responses	COMPLIANT	Construction activities did not result in recorded complaints or conflict with reserve users during the audit period. The construction footprint was controlled and separated from surrounding reserve areas. A register of formal external communications was maintained, and no complaints concerning access, recreational use or community disturbance were recorded or reported.
23.	EMP 4.17 Noise	Outcome: Avoid unnecessary noise generation. - Equipment/activities compliant with WC Noise Control Regs (PN 200/2013) - Noise complaints register; threshold assessment if ≥ 2 complaints	COMPLIANT	Construction noise did not result in recorded complaints or observable unreasonable disturbance during the audit period. Noise-generating activities were confined to the approved construction footprint and normal working activities. No excessive or unusual noise was noted during the audit, and no noise-related complaints were recorded or reported.

ITEM	EMPR REF	AUDIT CRITERIA	COMPLIANCE	COMMENTS
24.	EMP 4.18 Heritage	Outcome: Prevent damage to or impacts on heritage resources, including graves, palaeontological, or archaeological resources. • Chance-find procedure in place for excavation/earthworks • Immediate work stoppage & HWC notification on suspected finds	COMPLIANT	No archaeological, palaeontological or other heritage resources were encountered, disturbed or damaged during the audit period. No heritage material or chance finds were observed or reported within the active construction footprint. Environmental awareness training and site controls were in place.

4 EMPr REVIEW

4.1 Scope of the EMPr review

This review was restricted to the sections of the EMPr relevant to the current audit period, principally the construction-phase requirements contained in Section 4 of the EMPr. Requirements relating to rehabilitation, the downstream fishway and channel works, and the Rondevlei phase were considered only to determine whether they had become applicable. These activities had not commenced or were not yet due at the time of the audit.

The review also considered the amendment made during the audit period to Figures 2 and 4 of the EMPr to provide for a larger temporary working area.

4.2 Relevance and effectiveness of the EMPr

No substantive shortcomings were identified in the content of the EMPr. It remains relevant and adequate to manage the environmental risks associated with the current construction activities. The environmental controls observed on site, together with the records maintained in the environmental file, demonstrate that the mitigation and management measures contained in the EMPr can be effectively implemented.

The amended working area shown in Figures 2 and 4 was also considered. The amendment provides additional temporary working space required for the implementation of the works but does not alter the authorised project scope, approved impact management outcomes or applicable environmental mitigation requirements. No new or materially increased environmental impacts or risks arising from the amended working area were identified during the audit.

4.3 EMPr amendment

Figures 2 and 4 of the EMPr were amended during the audit period to provide for a larger temporary working area. The ECO advised that the amendment would be processed in terms of Regulation 36(1) of the EIA Regulations, as the change is limited to an impact management action and does not amend an approved impact management outcome.

The auditor reviewed the amendment and supports its incorporation into the EMPr. The amended EMPr should be submitted with this audit report to DFFE for notification and record purposes.

No further amendment to the EMPr is recommended as a result of this audit. Its adequacy should continue to be reviewed during subsequent audits, particularly if the construction methodology or project scope changes, unforeseen environmental impacts arise, or monitoring indicates that any mitigation measures are no longer effective.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This was the first external environmental audit undertaken during the implementation phase of the project. Construction was limited to the Zeekoeflei Weir component at the time of the audit. The Rondevlei phase and the downstream fishway and channel works had not commenced, and rehabilitation requirements were not yet applicable.

The project was substantially compliant with the applicable requirements of the Environmental Authorisation and EMPr. No material non-compliance resulting in environmental harm, uncontrolled pollution or an unmitigated environmental impact was identified.

The construction site was appropriately demarcated and generally neat and well managed. Environmental controls included temporary cofferdams and lined barriers, waste-management facilities, spill kits, drip trays, hazardous-substance storage, sanitation facilities, wildlife controls and an organised environmental file. No uncontrolled sediment-laden or contaminated discharge was observed during the audit.

A hydraulic-oil spill occurred on 12 June 2026 following the failure of an excavator hose. The spill was contained, cleaned up and investigated, and no impact on a watercourse was recorded. Proof of the lawful disposal of the contaminated clean-up material still needs to be included in the site file.

Water had only recently begun overtopping the weir. Prior to this, the concrete works were undertaken within a dry and isolated work area. The changed water conditions now trigger the existing EMPr requirements for pH and turbidity monitoring. Following the audit inspection, the first water-quality monitoring results were received. These indicate that the implemented containment measures were effective, with the recorded turbidity increase remaining below the EMPr threshold. No visible downstream construction-related water-quality impact was reported; however, direct downstream measurements could not be obtained due to unsafe access during high flows. Continued monitoring remains appropriate while construction activities have the potential to affect surface water.

The EMPr remains relevant and adequate for managing the environmental impacts and risks associated with the current phase of construction. Figures 2 and 4 were amended during the audit period to provide for a larger temporary working area. The amendment relates to an impact management action and does not alter the approved impact management outcomes or authorised project scope. The auditor supports the amendment, which should be submitted with this audit report to DFFE for notification and record purposes. No further amendment to the EMPr is recommended as a result of this audit.

The following actions should be completed or followed up:

1. Complete and maintain the required daily fauna inspection registers for open excavations and trenches, and during flow diversions and cofferdam installations, including confirmation of inspections and details of any fauna observations or relocations.
2. Continue and record pH and turbidity monitoring whenever construction activities may affect surface water. Monitoring should include suitable upstream/background, impact-area and downstream locations where safe access is possible, with results assessed against the applicable EMPr thresholds and management measures adapted where elevated readings or downstream impacts are identified.
3. Obtain and retain proof of the lawful disposal of the material contaminated during the hydraulic-oil spill clean-up.

4. Submit the amended EMPr, incorporating the revised Figures 2 and 4, with this audit report to DFFE for notification and record purposes in terms of Regulation 36(1) of the EIA Regulations.
5. Undertake the next external environmental audit by June 2027, in accordance with the 12-monthly audit programme specified in the EMPr.

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

6 DECLARATIONS & CREDENTIALS OF THE INDEPENDENT AUDITOR

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



Signed by **Christine M.M Rabie** on **27 July 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.

7 APPENDICES:

7.1 AUDIT PHOTO SHEET



PHOTO 1: Site office – waste management bins



PHOTO 2: Site office – generator, drip tray and fire extinguisher



PHOTO 3: Site office – spill kit and general waste bin

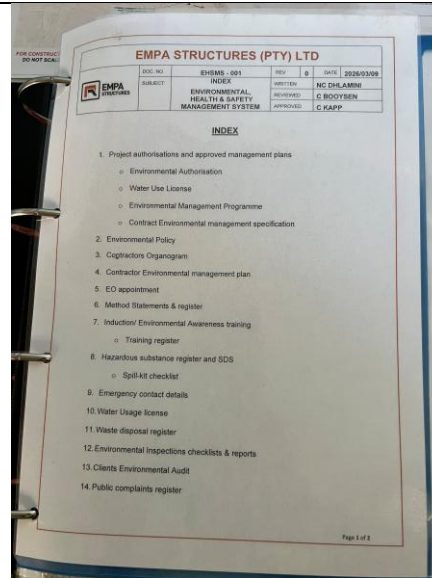


PHOTO 4: Contractor's environmental site file

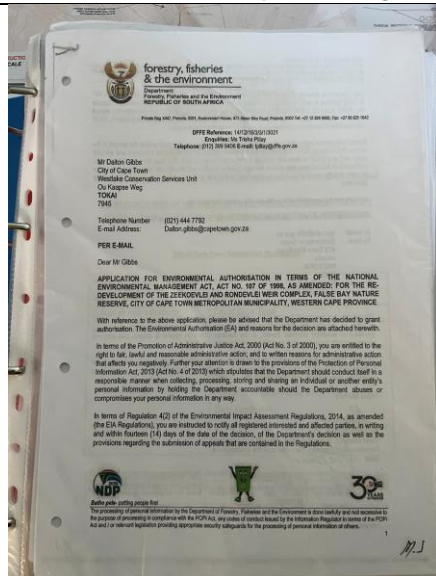


PHOTO 5: Environmental Authorisation on file



PHOTO 6: Water Use Registration on file

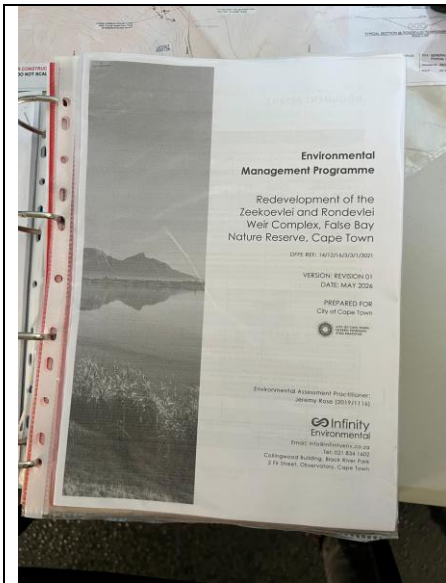


PHOTO 7: EMPR on file

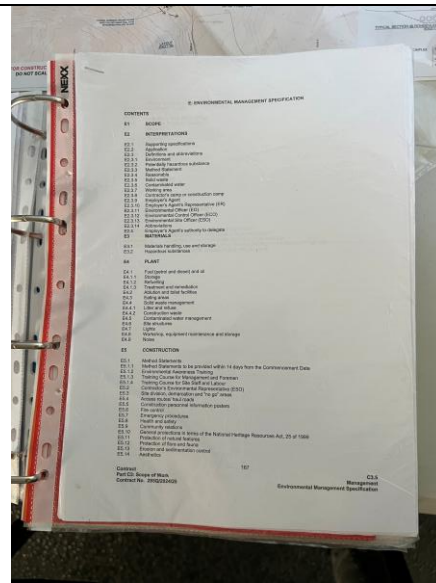


PHOTO 8: Environmental specifications from the construction contract

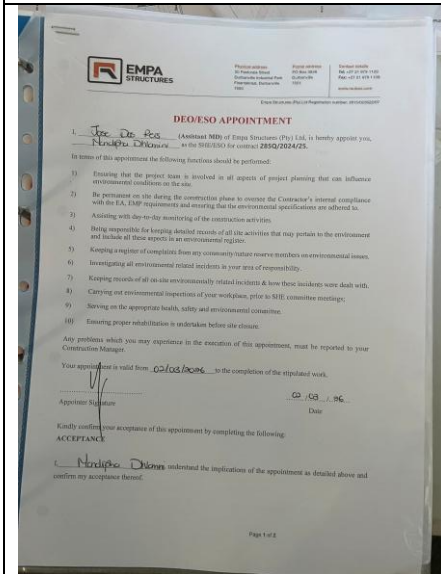


PHOTO 9: Appointment of the contractor's EO

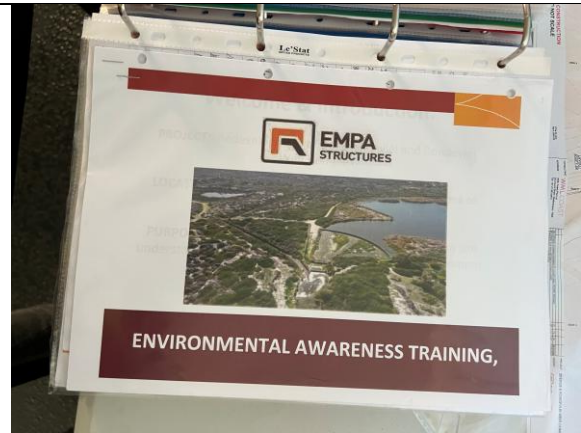


PHOTO 10: Contractor Environmental Awareness Training content

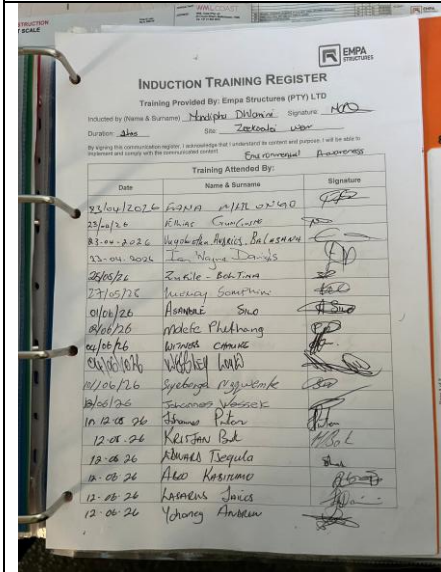


PHOTO 11: Example of an environmental induction attendance register

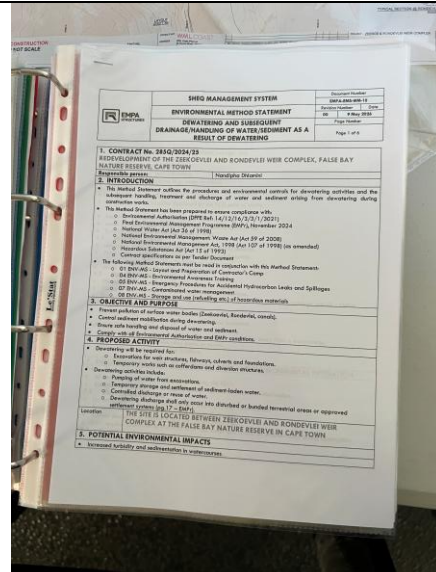


PHOTO 12: Example method statement on file (Dewatering)

HAZARDOUS SUBSTANCE REGISTER							
Upgrade of the Zeekoewlei Weir in the False Bay Nature Reserve							
No.	Type of Hazardous Substance	Date	Quantity	SDS	Service Provider	Responsible Person	Signature
1.	Diesel Fuel	14/04/24	4 x 200 L drums	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.
2.	Concrete	14/04/24	2 bags	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.
3.	Concrete	14/04/24	2 bags	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.
4.	Concrete	14/04/24	2 bags	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.
5.	Concrete	14/04/24	2 bags	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.
6.	Concrete	14/04/24	2 bags	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.
7.	Concrete	14/04/24	2 bags	✓	21 April 24	Mr. N. N. N.	Mr. N. N. N.

PHOTO 13: Hazardous Chemical Substances inventory on file

SAFETY DATA SHEET

Section 1: Identification

Product name: **SAFETY DATA SHEET**

Product code: **SAFETY DATA SHEET**

Product description: **SAFETY DATA SHEET**

Section 2: Hazards Identification

Classification of the substance or mixture: **SAFETY DATA SHEET**

Section 3: Composition/Information on Ingredients

Section 4: First Aid Measures

Section 5: Fire Fighting Measures

Section 6: Accidental Release Measures

Section 7: Handling and Storage

Section 8: Exposure Controls/Personal Protection

Section 9: Physical and Chemical Properties

Section 10: Stability and Reactivity

Section 11: Toxicological Information

Section 12: Ecological Information

Section 13: Disposal Considerations

Section 14: Transport Information

Section 15: Regulatory Information

PHOTO 14: Example SDS on file

SPILL KIT CHECKLIST

Site/Location: **Zeekoewlei Weir**

Site Manager: **Mr. N. N. N.**

Job Description: **Spill Kit Maintenance**

Inspector's Name: **Mr. N. N. N.**

Inspector's Signature: **Mr. N. N. N.**

Date: **14/04/24**

Approval Signature: **Mr. N. N. N.**

Approval date: **14/04/24**

PHOTO 15: Spill kit record/checklist

Waste Disposal Register

Client: **City of Cape Town**

Project: **Zeekoewlei Weir**

Document no: **EMPA-ENV-WDR-001**

Rev no: **000**

Effective date: **14/04/24**

Rev date: **14/04/24**

Waste Disposal Register

All Waste must be listed on this document and on the Waste Disposal Report

No	Date of Waste Disposal	Name of Person Disposing Waste	Type of Waste	Permit Filing in Report	Signature
1	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
2	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
3	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
4	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
5	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
6	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
7	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
8	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
9	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
10	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
11	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
12	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
13	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
14	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.
15	14/04/24	Mr. N. N. N.	General waste	Mr. N. N. N.	Mr. N. N. N.

PHOTO 16: Waste disposal register

ENVIRONMENTAL WEEKLY CHECKLIST

Client: **City of Cape Town**

Project: **Zeekoewlei Weir**

Document no: **EMPA-ENV-EWC-001**

Rev no: **000**

Effective date: **14/04/24**

Rev date: **14/04/24**

Project Name: **Zeekoewlei Weir**

Inspector Name: **Mr. N. N. N.**

Inspector Signature: **Mr. N. N. N.**

Date: **14/04/24**

Approval Signature: **Mr. N. N. N.**

Approval date: **14/04/24**

PHOTO 17: Contractor environmental weekly checklist



PHOTO 18: Emergency numbers displayed on site

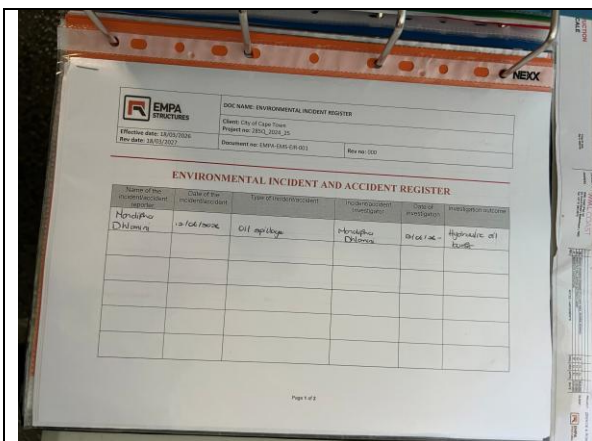


PHOTO 19: Incident register



PHOTO 20: Topsoil stockpiled for later use



PHOTO 21: Hazardous chemical substances locker (bunded)



PHOTO 22: Additional bunded storage area constructed



PHOTO 23: Generator on site with drip tray



PHOTO 24: Generator on site with drip tray



PHOTO 25: Spill kit on site



PHOTO 26: Drinking/wash water on site



PHOTO 27: Good demarcation and housekeeping



PHOTO 28: Ablution facilities on site



PHOTO 29: Concrete works in the foreground and cofferdam in place behind; contained water requires management in accordance with the approved MS



PHOTO 30: Another cofferdam in place



PHOTO 31: Water flow is ensured past the work area



PHOTO 32: Downstream of the work site



PHOTO 33: Future work area where the fishway will be constructed

Photos were taken by the auditor on 25 June 2026.