

# THE PROPOSED RIVERBANK MAINTENANCE AT SAN MARINO, ERF 586, KEURBOOMSTRAND, PLETTENBERG BAY.

EXTERNAL ENVIRONMENTAL AUDIT REPORT IN TERMS  
OF REGULATION 34 OF THE NEMA EIA REGULATIONS,  
2014 (AS AMENDED).

DEA&DP AMENDED EIA REF. NO. 16/3/3/1/D1/6/0014/20  
NEAS AMENDED REF. NO. WCP/EIA/0000960/2021



Prepared for:  
**San Marino Homeowners Association**

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KAPPEC

07 March 2025

## DETAILS OF THIS REPORT

|                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Status of this Report                                                                                                                                                                                                                                                                                                                                          | <b>Final Regulation 34 External Compliance Audit Report.</b>                                                                                                                                                  |
| Date Submitted                                                                                                                                                                                                                                                                                                                                                 | 07 March 2025                                                                                                                                                                                                 |
| Public Review Period                                                                                                                                                                                                                                                                                                                                           | Not Applicable                                                                                                                                                                                                |
| Report Title                                                                                                                                                                                                                                                                                                                                                   | The Proposed Riverbank Maintenance at San Marino, Erf 586, Keurboomstrand, Plettenberg Bay.                                                                                                                   |
| Applicant                                                                                                                                                                                                                                                                                                                                                      | <b>San Marino Homeowners Association</b><br>Mr L.Q. van Staden<br>P.O. Box 1303<br>Plettenberg Bay<br>6600<br>Mobile: 081 355 3284<br>E-mail: <a href="mailto:stadens@telkomsa.net">stadens@telkomsa.net</a>  |
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| <br>The logo for KAPP Environmental Consultants features a stylized green leaf and blue water droplet icon to the left of the word 'KAPP' in large, bold, dark grey letters. Below 'KAPP' is the text 'ENVIRONMENTAL CONSULTANTS' in a smaller, all-caps, sans-serif font. |                                                                                                                                                                                                               |

## DISCLAIMER

This report has been prepared for the San Marino Homeowners Association, represented by Mr L.Q. van Staden and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC).

The opinions expressed in this report have been based on the information supplied to KAPPEC by the Client and the relevant Environmental Assessment Practitioner. The Author has exercised all due care in reviewing the supplied information, but conclusions from the review are reliant on the accuracy and completeness of the supplied data. KAPPEC does not accept responsibility for any errors or omissions in the information supplied and does not accept any consequential liability arising from commercial decisions or actions resulting from them. KAPPEC accepts no liability or responsibility whatsoever for it in respect of any use of or reliance upon this report by any third party.

Opinions presented in this report apply to the site conditions and features as they existed at the time of the writing of this report, and those reasonably foreseeable.

Copying of this report without the permission of the Client and KAPPEC is not permitted.

## LETTER OF UNDERTAKING AND STATEMENT OF INDEPENDENCE

I Renier Kapp, as the appointed independent Environmental Practitioner hereby declare that I:

- Will perform the work relating to the appointment in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- Other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
- Work performed for this study was done in an objective manner irrespective of how such findings may be favourable or not to the applicant;
- declare that there are no circumstances that may compromise my objectivity in performing such work;
- All facts and findings will be presented in an objective manner in accordance with my professional experience and information derived from the study;
- have expertise in conducting the independent audit, including knowledge of the relevant legislation and any guidelines that have relevance to the development; and
- All particulars furnished in this report are true and correct.



(Renier Kapp)

---

**Signature of the Environmental Practitioner**

Kapp Environmental Consultants (Pty) Ltd (KAPPEC)

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**Name of Company**

07 March 2025

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**Date**

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## ABBREVIATIONS

|              |                                                   |
|--------------|---------------------------------------------------|
| MMP .....    | Maintenance Management Plan                       |
| DEFF .....   | Department of Environment, Forestry and Fisheries |
| DWS .....    | Department of Water Affairs and Sanitation        |
| EA .....     | Environmental Authorization                       |
| EAP .....    | Environmental Assessment Practitioner             |
| ECO .....    | Environmental Control Officer                     |
| EIA .....    | Environmental Impact Assessment                   |
| EMP .....    | Environmental Management Programme                |
| DEO .....    | Designated Environmental Officer                  |
| KAPPEC ..... | Kapp Environmental Consultants                    |
| I&AP .....   | Interested and Affected Parties                   |
| RE .....     | Resident Engineer                                 |

## APPENDICES

|                    |                           |
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## INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by the San Marino Homeowners Association, represented by Mr L.Q. van Staden (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 and 19 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to the San Marino Homeowners Association on March 14, 2022 (DEA&DP EIA Ref: 16/3/3/1/D1/6/0014/20) in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the EIA Regulations, 2014.

This external audit, conducted in alignment with the National Environmental Management Act (NEMA), is to increase the contractor's compliance rating in terms of the approved Environmental Authorization and the EMP. The body of this report will incorporate the auditable conditions and requirements contained in both the EA and the EMP. The conditions of the EA have been summarized in the report including its corresponding level of compliance with each condition.

The methodology followed for conducting the environmental audit included:

- Compilation of background information for site visit
- Site Visit (9 February 2025)
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report (06 March 2025)

The items have been included in table format and compliance will be indicated based on assigned colour significance as per Table 1 below:

**TABLE 1: COMPLIANCE RATING**

| Colour | Compliance Rating Significance                                                                                                    |
|--------|-----------------------------------------------------------------------------------------------------------------------------------|
| GREY   | A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.   |
| GREEN  | An item is marked green to indicate complete compliance in line with the EMP.                                                     |
| YELLOW | An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.                        |
| ORANGE | An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.                    |
| RED    | An item is marked red to indicate a significant or ongoing non-compliance which needs to be addressed as per the EAP instruction. |

## PROJECT DESCRIPTION

The project involves the replacement of existing creosote timber poles and mooring buoys with a more environmentally sustainable riverbank protection and mooring system at the San Marino complex, located within the Keurbooms River Estuary. The proposed design integrates a sloping stepped sandbag foundation covered by vegetated reno-mattresses to enhance ecological resilience and stability. This initiative aligns with the existing embankment upgrade at Blue Waters River Estate and Silverstreams River Estate, ensuring homogeneous riverbank protective measures throughout the area.

The proposed works include the following key activities:

- **Replacement of Existing Retaining Structure:** The current creosote-treated timber retaining wall will be replaced with a sloping stepped sandbag foundation covered by reno-mattresses. These will be re-vegetated with indigenous riparian vegetation found naturally in the estuary's intertidal zone.
- **Extent of Reno-Mattress Construction:** The reno-mattress will extend 2-3 meters beyond the existing retaining wall, sloping downward into the estuary and meeting the bed approximately 2 meters beyond the existing wall. The toe of the reno-mattress will extend an additional 2.5 meters into the estuary, reaching the floating jetty walkway adjacent to the SANRAL slipway.
- **Integration with Adjacent Developments:** The new riverbank structure will seamlessly tie into the existing bank stabilisation at Blue Waters River Estate to ensure erosion control and consistency in design.
- **Mooring System Upgrade:** The existing 19 mooring buoy anchors will be replaced with a floating jetty system designed to accommodate 19 boats. The floating jetty will be accessed via a gangplank from the shore and anchored using a 6-meter-long CCA-treated timber pole (or suitable environmentally friendly alternative), driven 4 meters into the sand bed.
- **Jetty Design:** The jetty structure will feature 4-meter-long by 0.7-meter-wide mooring fingers, spaced 5 meters apart, ensuring safe and convenient boat access. The floating jetty will eliminate the need for individuals to walk in the intertidal zone to reach their vessels.

### Activity Need and Desirability

The existing retaining wall structure has reached the end of its service life due to timber decay and instability. The proposed riverbank protection and mooring system offer multiple benefits:

- **Environmental Benefits:** The use of sandbags, reno-mattresses, and indigenous vegetation creates a more natural and ecologically sustainable riverbank structure, reducing reliance on chemically treated wood.
- **Erosion Control and Property Protection:** The new structure will prevent further riverbank erosion, providing long-term stability and safeguarding adjacent properties.



- **Restoration of Riparian Buffer:** Indigenous vegetation re-establishment will enhance habitat quality and ecological functions in the estuarine zone.
- **Improved Boat Access and Safety:** The floating jetty system provides a stable and convenient access point, reducing human impact on the intertidal zone.

### **Construction Sequence**

The following construction steps will be undertaken:

1. **Site Preparation:** Demarcation of the working area and rescue of *Zostera* rhizomes for later rehabilitation.
2. **Excavation and Foundation Preparation:** Excavation at low tide to create a level working platform, followed by placement of a "Rockgrip" layer for stability.
3. **Installation of Reno-Mattresses and Sandbag Foundation:** Placement of reno-mattresses at the toe of the structure to prevent undercutting, followed by staged sandbag placement with geotextile containment for structural integrity.
4. **Compaction and Stability Measures:** Sand sourced from the riverbank and eroded material will be compacted within geotextile containers to form the embankment layers.
5. **Final Stabilisation and Vegetation Rehabilitation:** The reno-mattress surface will be re-vegetated with indigenous plant species, including Buffalo grass (*Stenotaphrum secundatum*), to promote ecological integration.
6. **Jetty Installation:** Construction of the floating jetty system, gangplank access, and anchoring poles to secure the structure.

## LISTED ACTIVITIES

### ***Environmental Impact Assessment Regulations Listing Notice 1 of 2014, Government Notice No. 983 of 4 December 2014***

#### **Activity Number: 12**

##### Activity Description:

The development of—

- (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or
- (ii) infrastructure or structures with a physical footprint of 100 square metres or more;

where such development occurs—

- (a) within a watercourse;
- (b) in front of a development setback; or
- (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; —

excluding—

- (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;
- (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;
- (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;
- (dd) where such development occurs within an urban area;
- (ee) where such development occurs within existing roads, road reserves or railway line reserves; or
- (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.

*The proposal will entail the development of floating jetties and the replacement of the current riverbank stabilisation structures that will exceed 100 m<sup>2</sup> within the Keurbooms River Estuary.*

#### **Activity Number: 15**

##### Activity Description:

The development of structures in the coastal public property where the development footprint is bigger than 50 square metres, excluding—

- (i) the development of structures within existing ports or harbours that will not increase the development footprint of the port or harbour;

- (ii) the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;
- (iii) the development of temporary structures within the beach zone where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or
- (iv) activities listed in activity 14 in Listing Notice 2 of 2014, in which case that activity applies.

*The proposal will entail the development of floating jetties and the replacement of the current riverbank stabilisation structures that exceed 50 m<sup>2</sup> within the Keurbooms River Estuary and Coastal Public Property (CPP).*

*The jetty is regarded as falling into the CPP and will provide restricted public access and replace the current moorings and access to moored boats.*

**Activity Number: 17**

Activity Description:

Development—

- (i) in the sea;
- (ii) in an estuary;
- (iii) within the littoral active zone;
- (iv) in front of a development setback; or
- (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater;

in respect of—

- (a) fixed or floating jetties and slipways;
- (b) tidal pools;
- (c) embankments;
- (d) rock revetments or stabilising structures including stabilising walls;

or

- (e) infrastructure or structures with a development footprint of 50 square metres or more —

but excluding—

- (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour;
- (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;
- (cc) the development of temporary infrastructure or structures where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or
- (dd) where such development occurs within an urban area.

*The proposal will entail the development of floating jetties and the replacement of the current*

*riverbank stabilisation structures that will exceed 50 m<sup>2</sup> within the Keurbooms River Estuary.*

**Activity Number: 19**

Activity Description:

The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;

but excluding where such infilling, depositing, dredging, excavation, removal or moving—

- (a) will occur behind a development setback;
- (b) is for maintenance purposes undertaken in accordance with a maintenance management plan;
- (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;
- (d) occurs within existing ports or harbours that will not increase the ment footprint of the port or harbour; or
- (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.

*The proposed works will require movement of the existing material in the bank to remove the existing timber walls and then fill the sandbags and install them at the new proposed slope. Pumping of mobile sand from the system to complete the work will be required (as per specialist recommended area). Bank shaping will be required to achieve the new slope. The bulk of this sand moved will come from the existing bank and estuarine system and is part of the normal erosion and accretion within the estuary.*

**Activity Number: 19A**

Activity Description:

The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from—

- (i) the seashore;
- (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or
- (iii) the sea; —

but excluding where such infilling, depositing, dredging, excavation, removal or moving—

- (a) will occur behind a development setback;
- (b) is for maintenance purposes undertaken in accordance with a maintenance management plan;
- (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;
- (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or
- (e) where such development is related to the development of a port or harbour, in which case activity

26 in Listing Notice 2 of 2014 applies.

*The proposed works will require movement of the existing material in the riverbank to remove the existing timber walls and then fill the sandbags and install them at the new proposed slope. Pumping of mobile sand from the system to complete the work will be required (as per specialist recommended area). Bank shaping will be required to achieve the new slope. The bulk of this sand moved will come from the existing bank and estuarine system and is part of the normal erosion and accretion within the estuary.*

**Activity Number: 54**

Activity Description:

The expansion of facilities—

- (i) in the sea;
  - (ii) in an estuary;
  - (iii) within the littoral active zone;
  - (iv) in front of a development setback; or
  - (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater;
- in respect of—
- (a) fixed or floating jetties and slipways;
  - (b) tidal pools;
  - (c) embankments;
  - (d) rock revetments or stabilising structures including stabilising walls; or
  - (e) infrastructure or structures where the development footprint is expanded by 50 square metres or more,

but excluding—

- (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; or
- (bb) where such expansion occurs within an urban area.

*The replacement of the vertical timber pole retaining walls with a sandbag and reno-mattress bank protection will see the expansion of the physical footprint of the structures by more than 50m<sup>2</sup>.*

***Environmental Impact Assessment Regulations Listing Notice 3 of 2014, Government Notice No. 985 of 4 December 2014***

**Activity Number: 14**

Activity Description:

The development of—

- (i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or
- (ii) infrastructure or structures with a physical footprint of 10 square metres or more;

where such development occurs—

- (a) within a watercourse;
- (b) in front of a development setback; or
- (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;

excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.

**i. Western Cape**

i. Outside urban areas:

- (aa) A protected area identified in terms of NEMPAA, excluding conservancies;
- (bb) National Protected Area Expansion Strategy Focus areas;
- (cc) World Heritage Sites;
- (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;
- (ee) Sites or areas listed in terms of an international convention;
- (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;
- (gg) Core areas in biosphere reserves; or
- (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.

*The installation of floating jetties and bank stabilisation measures (larger than 10 m<sup>2</sup>) on the Keurbooms River to replace the existing moorings.*

**Activity Number: 23**

Activity Description:

The expansion of—

- (i) dams or weirs where the dam or weir is expanded by 10 square metres or more; or

(ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more;

where such expansion occurs—

- (a) within a watercourse;
- (b) in front of a development setback adopted in the prescribed manner; or
- (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;

excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.

#### **i. Western Cape**

i. Outside urban areas:

- (aa) A protected area identified in terms of NEMPAA, excluding conservancies;
- (bb) National Protected Area Expansion Strategy Focus areas;
- (cc) World Heritage Sites;
- (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;
- (ee) Sites or areas listed in terms of an international convention;
- (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;
- (gg) Core areas in biosphere reserves; or
- (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.

*The replacement of the vertical timber pole retaining walls with a sandbag and reno-mattress bank protection will result in the expansion of the physical footprint of the current retaining structure.*

## **REGULATION 34 EXTERNAL AUDIT REQUIREMENTS**

This section will attempt to detail the content requirements to be included as part of a Regulation 34 Audit Report as outlined in terms of Appendix 7 of Regulation 982 of the 2014 EIA Regulations.

### **Environmental audit report**

The environmental audit report must provide recommendations regarding the need to amend the EMPr, and where applicable, the closure plan.

### **Objective of the environmental audit report**

The objective of the environmental audit report is to

- a) report on –
  - i. the level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan; and
  - ii. the extent to which the avoidance, management and mitigation measure provided for in the EMPr, and where applicable, the closure plan achieve the objectives and outcomes of the EMPr, and closure plan;
- b) identify and assess any new impacts and risks as a result of undertaking the activity;
- c) evaluate the effectiveness of the EMPr, and where applicable, the closure plan; and
- d) identify shortcomings in the EMPr, and where applicable the closure plan, and
- e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

### **Content of environmental audit reports**

(1) An environmental audit report prepared in terms of these Regulations must contain –

- a) details of the –
  - i. independent person who prepared the environmental audit report; and
  - ii. expertise of the independent person that compiled the environmental audit report;
- b) a declaration that the independent auditor is independent in a for as may be specified by the competent authority;
- c) an indication of the scope of, and purpose for which, the environmental audit report was prepared;
- d) a description of the methodology adopted in preparing the environmental audit report;
- e) an indication of the ability of the EMPr, and where applicable, the closure plan to –
  - i. sufficiently provide for the avoidance, management and mitigation of environmental



- impacts associated with the undertaking of the activity on an on-going basis;
- ii. sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
- iii. ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan;
- f) a description of any assumptions made, and any uncertainties or gaps in knowledge;
- g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;
- h) a summary and copies of any comments that were received during any consultation process; and
- i) any other information requested by the competent authority.

#### **Additional requirement as per the EA of the environmental audit report**

The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme:

- a) Auditing during the non-operational phase (construction activities):
  - During the period which the development activities have been commenced with on site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.
  - A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within three (3) months of completion of the post construction rehabilitation and monitoring requirements.
- b) Auditing during the operational phase (post construction and maintenance activities):
  - During the post-construction and maintenance phase, the Holder must ensure annual environmental audit(s) are undertaken following the completion of the construction phase/post construction rehabilitation and monitoring requirements and such Environmental Audit Report(s) must be submitted annually to the Competent Authority.

Note: The final auditing requirements should be completed and submitted at least three months prior to expiry of the validity period of the environmental authorisation to ensure the Holder is able to comply with all the environmental auditing and reporting requirements and for the competent authority to be able to process it timeously.

The Environmental Audit Report(s), must–

- a) be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process;

- b) provide verifiable findings, in a structured and systematic manner, on–
  - the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and
  - the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
- c) identify and assess any new impacts and risks as a result of undertaking the activity;
- d) evaluate the effectiveness of the EMPr;
- e) identify shortcomings in the EMPr;
- f) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
- g) indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
- h) indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;
- i) include a photographic record of the site applicable to the audit; and
- j) be informed by the ECO reports.

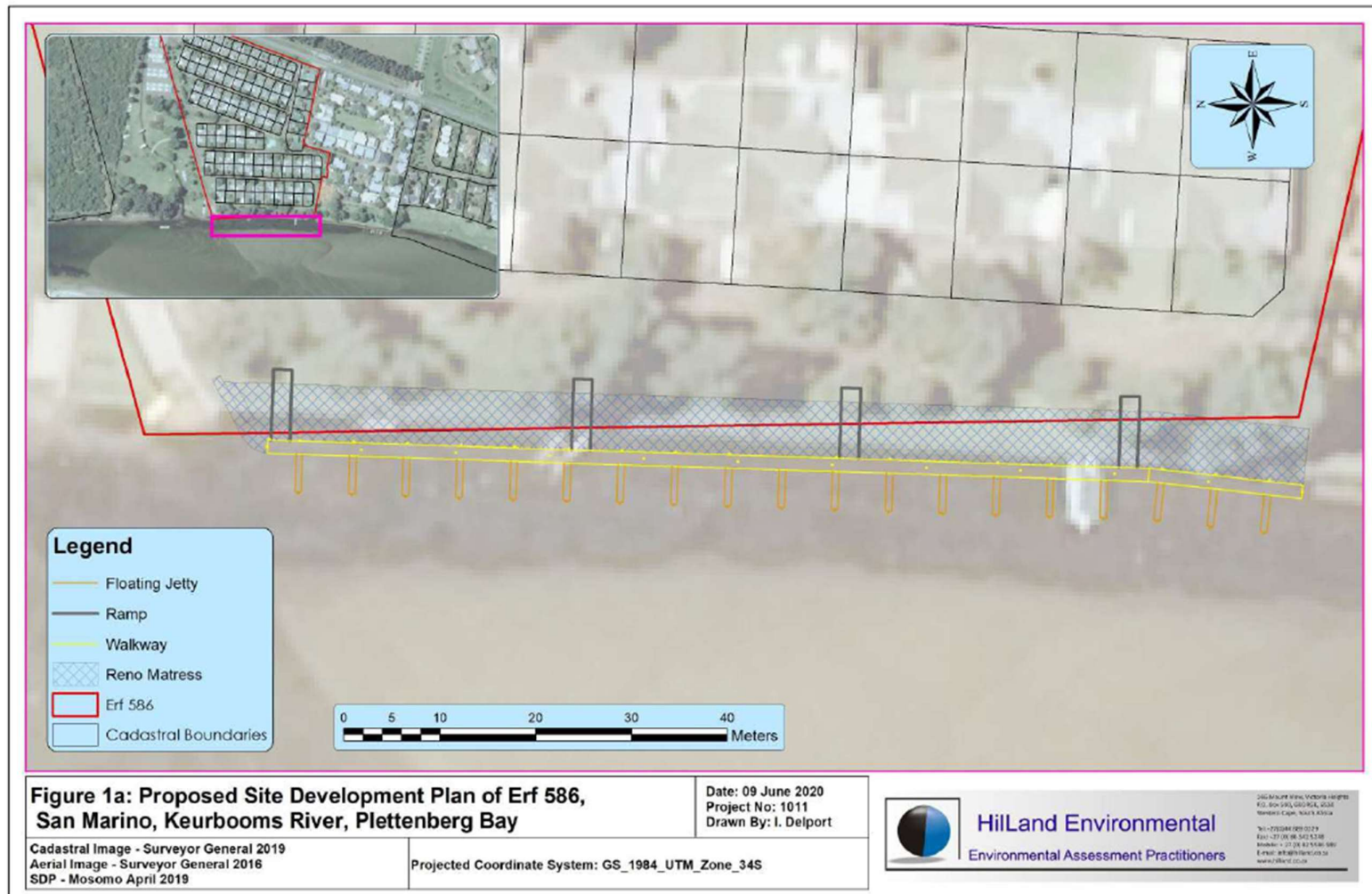


FIGURE 1: SITE PLAN



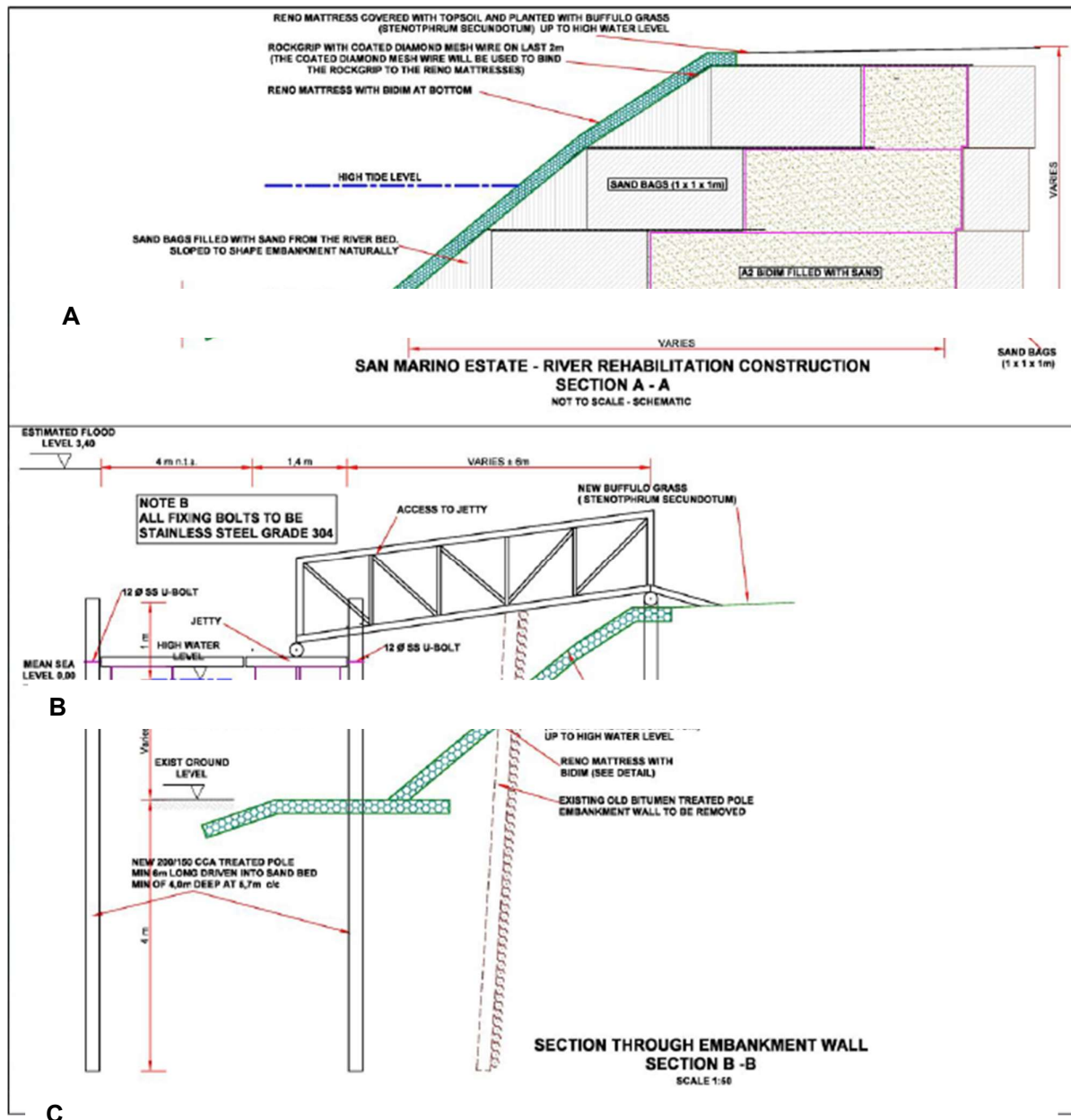


FIGURE 3: A: PROPOSED SLOPING STEPPED SANDBAG FOUNDATION  
B. REVEGETATED RENO-MATTRESS AND EXISTING EMBANKMENT WALL  
C. UPSTREAM EXTENSION OF THE TOE OF THE RENO-MATTRESS

## CONDITIONS OF AUTHORISATION

**TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE**

| No. | EA CONDITIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | COMPLIANCE FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | This Environmental Authorisation is granted for the period from date of issue until <b>30 September 2030</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | DEA&DP was notified of commencement on 1 September 2022. The intended physical activities commenced after the 2023 Easter Holiday (11 <sup>th</sup> of April 2023).                                                                                                                                                                                                                                                                                                                                                                                          |
| 2.  | <p>The non-operational component (construction phase) of the Environmental Authorisation is subject to the following:</p> <p>2.1 The Holder must start with the physical implementation of all the authorised listed activities on the site within 24-months from the date of issue.</p> <p>2.2 The Holder must conclude the physical implementation of all the authorised listed activities on the site by <b>31 March 2027</b>.</p> <p>2.3 The holder must finalise the post construction rehabilitation and monitoring requirements within a period of 6-months from the date the development activity (construction phase) is concluded.</p> <p><b>Note:</b> Failure to complete the post construction rehabilitation and monitoring requirements at least six-months prior to expiry of the validity period of an environmental authorisation may result in the Holder not being able to comply with the environmental auditing requirements in time.</p> | <p>An Environmental Authorisation (EA) was granted to the San Marino Homeowners Association on March 14, 2022 (DEA&amp;DP EIA Ref: 16/3/3/1/D1/6/0014/20). The Holder commenced with physical activities after the 2023 Easter Holiday on the 11<sup>th</sup> of April 2023, 13 months after the date of issue.</p> <p>According to the supplied ECO reports construction was completed on the 19<sup>th</sup> of March 2024.</p> <p>Rehabilitation was completed on the 25<sup>th</sup> of October 2024, 7 months after the completion of construction.</p> |
| 3.  | The post-construction and maintenance component (operational                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted, rehabilitation was completed on the 25 <sup>th</sup> of October 2024.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|                  | <p>phase) of this Environmental Authorisation is granted until <b>31 March 2030</b> during which period maintenance to the reno-mattresses and jetties and monitoring requirements and reporting must be finalised.</p> <p><b>Note:</b> The maintenance monitoring requirements should be completed at least six (6) months prior to expiry of the validity period of an environmental authorisation to ensure the Holder is able to comply with the environmental auditing requirements in time.</p> <p>Failing which, this Environmental Authorisation shall lapse, unless the environmental authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).</p> | <p>The ECO completed the internal monitoring requirements on the 20<sup>th</sup> of January 2025. The External Audit was conducted on the 9<sup>th</sup> of February 2025, within the project's validity period.</p> |
| <p><b>4.</b></p> | <p>The Holder is authorised to undertake the listed activities specified in Section B above in accordance with the Preferred Alternative described in the FBAR dated 5 November 2021 on the site as described in Section C above.</p> <p>This Environmental Authorisation is only for the implementation of the Preferred Alternative for the site which entails:</p> <p>The Holder is herein authorised to undertake the following activity that includes the listed activities as it relates to the replacement of existing creosote timber poles and mooring buoys with the development of a sloping stepped sandbag foundation with vegetated reno-mattresses within the Keurbooms River Estuary at the San Marino complex.</p> <p>The proposed riverbank design will tie in with the existing</p>                       | <p>Noted. All listed activities as set forth in the EA have been implemented in line with this authorized Preferred Alternative.</p>                                                                                 |



embankment upgrade at Blue Waters River Estate and Silverstreams River Estate (located downstream of San Marino) and as such, will result in homogeneous riverbank protective measures with existing boat moorings on controlled floating jetty structures.

The authorisation is for the Preferred alternative which entails the infilling, depositing, excavation and moving of sand of more than 5m<sup>3</sup> within 100 metres of the highwater mark of the estuary and the construction of structures and infrastructure for the purpose of:

The replacement of the existing creosote timber poles and vertical riverbank retaining wall with a different designed retaining structure consisting of a structure that will consist of a sloping stepped sandbag foundation covered by reno-mattress construction which will be re-vegetated with indigenous vegetation that occurs naturally in the intertidal zone of the estuary (based on natural zonation). The reno-mattress will extend approximately 2-3 m beyond the line of the existing retaining wall sloping downwards into the estuary, meeting the bed of the estuary (approximately 2 m beyond the line of the existing retaining wall). The toe of the reno-mattress will extend approximately 2.5 m further into the estuary to the floating jetty walkway running parallel to the riverbank (adjacent to the existing SANRAL slipway). The downstream bank will tie in with the bank stabilisation at Blue Waters River Estate.

The existing 19 moorings (buoy anchor) will be replaced with a floating jetty with mooring points for 19 boats which will be accessed by a gang plank from the shore. The jetty will be anchored to a 6 m



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|    | <p>long CCA treated timber pole (or suitable alternative) which will be driven into the sand bed (depth of 4 m). The 4 m x 0.7 m “fingers” of the jetty will be spaced 5 m apart extending into the estuary with the walkway removing the necessity to walk in the intertidal zone to access the boats.</p> <p>The works must be done in accordance with the design by MOSOMO (dated April 2019) Drawing number 949-San Marino-2 (Annexure 2).</p>                                                                                        |                                                                                                                                                                                                                                  |
| 5. | This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme (“EMPr”).                                                                                                                                                                                                                                                                                                                                                                                                      | According to the supplied ECO reports and the site audit findings, the EMPr was implemented during the construction activities on-site.                                                                                          |
| 6. | 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, the holder holds all responsibility for the actions undertaken by anyone on site.                                                                                                                                         |
| 7. | Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the Holder to apply for further authorisation in terms of the applicable legislation. | Noted. No changes or deviations from the scope of the project description have occurred since the EA was obtained/approved.                                                                                                      |
| 8. | <p>8. The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision–</p> <p>8.1. notify all registered Interested and Affected Parties (“I&amp;APs”) of –</p>                                                                                                                                                                                                                                                                                                                                               | <p>The I&amp;AP Notification letter after the approval of the EA was sent on the 14<sup>th</sup> of March 2022 (same day when the EA was granted).</p> <p>All of the required information was provided as stipulated in this</p> |

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|    | <p>8.1.1. the decision reached on the application;</p> <p>8.1.2. the reasons for the decision as included in Annexure 3;</p> <p>8.1.3. the date of the decision; and</p> <p>8.1.4. the date when the decision was issued.</p> <p>8.2. draw the attention of all registered I&amp;APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below;</p> <p>8.3. draw the attention of all registered I&amp;APs to the manner in which they may access the decision;</p> <p>8.4. provide the registered I&amp;APs with the:</p> <p>8.4.1. name of the Holder (entity) of this Environmental Authorisation,</p> <p>8.4.2. name of the responsible person for this Environmental Authorisation,</p> <p>8.4.3. postal address of the Holder,</p> <p>8.4.4. telephonic and fax details of the Holder,</p> <p>8.4.5. e-mail address, if any, of the Holder,</p> <p>8.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&amp;APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended).</p> <p>8.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&amp;APs of this decision.</p> <p>8.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.</p> | <p>condition.</p> <p>No appeals have been lodged against the EA.</p> |
| 9. | 9. Seven calendar days' notice, in writing, must be given to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | DEA&DP was notified of commencement on 1 September 2022.             |

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|     | <p>Competent Authority before commencement of any activities.</p> <p>9.1. The notice must make clear reference to the site details and EIA Reference number given above.</p> <p>9.2. The notice must also include proof of compliance with the following conditions described herein:</p> <p><b>Conditions no.: 8, 11 and 13.</b></p> <p>9.3. Seven calendar days' notice, in writing, must be given to the Competent Authority on the commencement of any maintenance activities to any structures during the period that the environmental authorisation is valid.</p> | <p>The intended physical activities commenced after the 2023 Easter Holiday (11<sup>th</sup> of April 2023).</p> <p>A notification of commencement was sent to DEA&amp;DP on the 1 September 2022, 7 months prior to commencement and made clear reference to the site details, EIA Reference, and proof of compliance.</p> <p><b>Condition 8:</b> The I&amp;AP Notification letter after the approval of the EA was sent on the 14<sup>th</sup> of March 2022 (same day when the EA was granted).</p> <p><b>Condition 11:</b> The final EMP<sub>r</sub> was submitted to DEADP for approval, on the 22<sup>nd</sup> of March 2022.</p> <p><b>Condition 13:</b> HillLand Environmental was appointed as ECO on the site and submitted monthly reports.</p> |
| 10. | Seven calendar days' written notice must be given to the Competent Authority on completion of the construction activities.                                                                                                                                                                                                                                                                                                                                                                                                                                               | ECO report no. 9 served as notification of completion of construction activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 11. | <p>The draft or Environmental Management Programme ("EMP<sub>r</sub>") submitted as part of the application for Environmental Authorisation must be amended and submitted to this Department prior to commencement of any activities on the site:</p> <p>11.1. The EMP<sub>r</sub> must be amended to incorporate the following —</p> <p>11.1.1. Incorporate all the conditions given in this Environmental Authorisation;</p> <p>11.1.2. All monthly ECO reports to be submitted to the competent authority.</p>                                                        | <p>The final EMP<sub>r</sub> was submitted to DEADP for approval, on the 22<sup>nd</sup> of March 2022.</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant, monthly ECO reports have been submitted to DEA&amp;DP.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12. | The EMP <sub>r</sub> must be included in all contract documentation for all phases of implementation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | An environmental file is available on-site and includes all the necessary documentation (Method Statements, EA, and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | required EMPr).                                                                                                                                        |
| <b>13.</b> | The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.                                                                                                                                                                                                                                                                                                                                        | HiLand Environmental was appointed as ECO on the site and submitted monthly reports to DEA&DP.                                                         |
| <b>14.</b> | <p>The ECO must–</p> <p>14.1. be appointed prior to commencement of any works (i.e. removal and movement of soil);</p> <p>14.2. ensure compliance with the EMPr and the conditions contained herein;</p> <p>14.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO;</p> <p>14.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised.</p> | HiLand Environmental was appointed as ECO on the site and submitted monthly reports to DEA&DP during the construction and rehabilitation phase.        |
| <b>15.</b> | A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and be made available to anyone on request, and where the Holder has website, such documents must be made available on such publicly accessible website.                                                                                               | An environmental file is available on-site and includes all the necessary documentation.                                                               |
| <b>16.</b> | Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.                                                                                                                                                                                                            | Access to the site referred to in Section C is granted, the environmental reports will be presented to the Competent Authority who requests to see it. |

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| 17. | The Holder must, for the period during which the environmental authorisation and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Compliant as per the proof of ECO reports supplied.                                                                                                                                                                                                                                                                                                                                                                                                          |
| 18. | <p>18. The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme:</p> <p>18.1. Auditing during the non-operational phase (construction activities):</p> <p>18.1.1. During the period which the development activities have been commenced with on site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.</p> <p>18.1.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within <b>three (3) months</b> of completion of the post construction rehabilitation and monitoring requirements.</p> <p>18.2. Auditing during the operational phase (post construction and maintenance activities):</p> <p>18.2.1. During the post-construction and maintenance phase, the Holder must ensure annual environmental audit(s) are undertaken following the completion of the construction phase/post construction rehabilitation and monitoring requirements and such Environmental Audit Report(s) must be submitted annually to the Competent Authority.</p> <p><b>Note:</b> The final auditing requirements should be completed and submitted at least three months prior to expiry of the validity period of the environmental authorisation to ensure the Holder is able to</p> | <p>Kapp Environmental Consultants has been appointed by the San Marino Homeowners Association, represented by Mr L.Q. van Staden (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 and 19 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).</p> <p>The external audit was conducted on 9 February 2025.</p> |

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|            | comply with all the environmental auditing and reporting requirements and for the competent authority to be able to process it timeously.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>19.</b> | <p>The Environmental Audit Report(s), must–</p> <p>19.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process;</p> <p>19.2. provide verifiable findings, in a structured and systematic manner, on–</p> <p>19.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and</p> <p>19.2.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.</p> <p>19.3. identify and assess any new impacts and risks as a result of undertaking the activity;</p> <p>19.4. evaluate the effectiveness of the EMPr;</p> <p>19.5. identify shortcomings in the EMPr;</p> <p>19.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;</p> <p>19.7. indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;</p> <p>19.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;</p> | <p>Kapp Environmental Consultants has been appointed by the San Marino Homeowners Association, represented by Mr L.Q. van Staden (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 and 19 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).</p> <p>The external audit was conducted on 9 February 2025. All requirements have been included in this report.</p> |

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|     | <p>19.9. include a photographic record of the site applicable to the audit; and</p> <p>19.10. be informed by the ECO reports.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                               |
| 20. | <p>The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&amp;APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted.                                                                        |
| 21. | <p>Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.</p> <p>Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.</p> | No heritage remains were exposed during construction and excavations on site. |

## SITE AUDIT FINDINGS

A detailed site visit and external audit were undertaken by Kappec on the 9<sup>th</sup> of February 2025. The construction and rehabilitation activities at the San Marino complex have been completed per the Environmental Authorisation (EA) and Environmental Management Programme (EMPr). The site is now officially in the operational phase, with the newly installed jetties in use by residents. The following findings summarize the key aspects of the project implementation and outcomes:

### **Zostera and Seahorse Rescue**

The initial requirement to rescue *Zostera* rhizomes was no longer necessary, as sand deposition had shifted the *Zostera* beds into deeper water outside the working area. Seahorse rescue was also not required, as they inhabit deeper water and would not survive exposure at low tide. The *Zostera* beds have re-established successfully following riverbank maintenance.

### **Mooring Pole Replacement**

Existing mooring poles were removed and replaced with creosote-treated and aged poles. Due to the steep bank and distance to the new pole positions, installation was carried out using machinery at low tide. Nineteen (19) poles were successfully installed over two days (19th and 20th April 2023).

### **Excavation and Installation of Reno Mattresses**

A level working platform for the reno mattress toe was excavated at low tide, with all excavated material retained within the working area and used for filling sandbags. Any displaced organisms were able to return to the river during high tide. Toe reno mattresses were installed, except at the termination sections on either side.

### **Sediment Control**

A silt curtain was attached to the mooring poles to contain sediment movement within the working area.

### **Geofabric Installation**

A geofabric layer was secured to the reno mattress toe baskets and positioned to extend under the toe and up the slope, with overlap provided for continuity between basket placements.

### **Erosion Protection Measures**

Two rows of sandbags were placed along the low tide contour to form a protective barrier against erosion. These bags were filled with sand from the working area, and natural tidal wetting ensured effective compaction.

### **Vegetation and Rehabilitation**

Organic material was placed over the reno-mattresses in the intertidal zone and along the bank. Indigenous riparian vegetation was planted to restore a natural aesthetic, with lawn reinstated and yellowwood trees planted. Kikuyu grass has primarily established over the kweek, and mowing of



the grass along the bank continues, except for areas closest to the water. Terrestrial planting was completed at the top of the bank, with salt marsh vegetation planted along the slopes. Bush clumps were also introduced. The reno-mattresses have been successfully revegetated and the riverbank fully rehabilitated during the site audit.

### **Floating Jetty Installation**

Nineteen (19) floating jetties, each four (4) metres in length and spaced five (5) metres apart, were installed. Timber walkways provide access from the existing riverbank.

### **Compliance and Completion**

The holder and contractor have remained compliant with the EA and EMPr throughout the process. No penalties for non-compliance were issued. The rehabilitation was carried out in accordance with the EMPr, with *Zostera* beds now established under the floating jetties.

The project has been completed successfully, with the riverbank fully rehabilitated and infrastructure now operational.

## ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

**TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE**

| No.       | EMP REQUIREMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | COMPLIANCE FINDING                                                                                                                                                |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1.</b> | <b>Site Demarcation and No-Go/Sensitive Areas</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                   |
| 1.1       | Work below the high-water mark must be limited and coverage of the existing beds by the reno-mattress should be minimised wherever possible to ensure that the remaining stock of plants could expand in range post-construction (Disturbance (i.e. trampling, smothering etc.) of eelgrass beds that fall outside of the footprint area of the reno-mattress should be minimised as far as possible to ensure that a stock of plants remaining that could expand in range post-construction.) | Reno-mattresses were successfully revegetated.                                                                                                                    |
| 1.2       | To ensure the potential improvement of the remaining patches of eelgrass to establish and spread over-time, <b>a 5 m gap between each jetty will be required.</b>                                                                                                                                                                                                                                                                                                                              | A 5m gap has been included between the floating jetties.                                                                                                          |
| 1.3       | The width of the jetties must be minimised as far as possible to reduce the effect of shading and the space between the planks of the walkways must be increased to improve light penetration beneath the jetties.                                                                                                                                                                                                                                                                             | The design plan was implemented accordingly.                                                                                                                      |
| 1.4       | Remove the existing steps leading from the bank into the estuary to restrict pedestrian access to the estuary.                                                                                                                                                                                                                                                                                                                                                                                 | According to the ECO reports the existing steps were removed.                                                                                                     |
| <b>2.</b> | <b>Vegetation Clearance, Plant Rescue Programme and Protection of Fauna and Flora</b>                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                   |
| 2.1       | Prior to commencement of construction and excavation activities to remove the existing timber wall the building footprint is to undergo an indigenous plant rescue survey. Any indigenous plants that are                                                                                                                                                                                                                                                                                      | <i>Zostera</i> rescue was not necessary as the siltation of the area meant that the <i>Zostera</i> beds were located in deeper water outside of the working area. |

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|     | deemed worth rescuing are to be properly bagged, stored and maintained in a temporary nursery established on-site (to be used in rehabilitation) or the plants in question are to be immediately transplanted out of the building footprint.                                                                                                                                                                                                            |                                                                                                                                                                   |
| 2.2 | Existing <i>Zostera capensis</i> (eelgrass) plants that are located within the footprint of the riverbank maintenance should be rescued if possible and transplanted to areas unaffected by the upgrade so as to establish new areas of growth.                                                                                                                                                                                                         | <i>Zostera</i> rescue was not necessary as the siltation of the area meant that the <i>Zostera</i> beds were located in deeper water outside of the working area. |
| 2.3 | Boat traffic over these areas should be prevented (e.g. through the placement buoys indicating 'no-go' areas) until such time as the plants have established.                                                                                                                                                                                                                                                                                           | Boat traffic was successfully controlled.                                                                                                                         |
| 2.4 | The removal, damage or disturbance of flora and fauna is <b>forbidden</b> outside the immediate construction area without the written approval of the ECO. The Contractor shall ensure that <b>no</b> hunting, trapping, shooting, poisoning or otherwise disturbance of any fauna takes place.                                                                                                                                                         | No flora and fauna were damaged or hurt during the construction area.                                                                                             |
| 2.5 | It is suggested that lawn from the work areas be removed as sod to replace when work is complete in the garden areas to restore stockpile sites and areas where machinery has moved and damaged the lawns.                                                                                                                                                                                                                                              | The lawn and replanted grass have completely been rehabilitated during the site audit.                                                                            |
| 2.6 | Should any endangered species or protected species listed in Schedule 3 and 4, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) or Protected Tree Species in accordance with the National Forests Act, 1998 (Act No.84 of 1998) be discovered during vegetation clearance, it may <b>not</b> be removed without the relevant permit and licensing.<br>Should any protected trees be discovered (during the | No endangered or protected species were discovered.                                                                                                               |

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|           | implementation of the plant rescue programme and / or vegetation clearing) that need transplant/pruning/removal a DAFF permit will be required in terms of the National Forest Act (NFA) (Act No.84 of 1998, as amended). |                                                                                                                                                                                                                      |
| 2.7       | All cut vegetation shall be disposed of off-site at an approved disposal site. Stockpiling of cut vegetation shall only be permitted in areas indicated by the ECO. <b>No</b> cut vegetation shall be burnt on site.      | Cut exotic trees were disposed of, and the trees were replaced with indigenous trees (yellowwood trees).                                                                                                             |
| 2.8       | The affected work area needs to be cleared of all listed invasive plants before construction is complete. Ongoing alien vegetation control should be implemented throughout the operational phase of the development.     | No alien clearing required to date. Exotic trees along the bank were removed. The pre-existing kikuyu grass remains.                                                                                                 |
| <b>3.</b> | <b>Demarcation of the Working Area and Access</b>                                                                                                                                                                         |                                                                                                                                                                                                                      |
| 3.1       | All working areas are to be restricted to the immediate bank and lawn areas.                                                                                                                                              | According to the ECO reports, all work continued within the construction boundary.                                                                                                                                   |
| 3.2       | No work below the toe of the reno-mattress slope is permitted.                                                                                                                                                            | According to the ECO reports, all work continued within the construction boundary.                                                                                                                                   |
| 3.3       | All people working on site must be made aware of the boundaries in which work is to be done. Those areas, in which no work is required, are to be considered as no-go areas.                                              | According to the ECO reports, all work continued within the construction boundary.                                                                                                                                   |
| 3.4       | Access to the site may only be gained via the existing internal roads of San Marino. No new roads may be created.                                                                                                         | No additional access roads were created during construction.                                                                                                                                                         |
| <b>4.</b> | <b>Contractor Site Camp and Storage of Construction Material</b>                                                                                                                                                          |                                                                                                                                                                                                                      |
| 4.1       | If a campsite is to be set up, during construction it needs to be on the lawn adjacent to the work being undertaken.                                                                                                      | According to the supplied ECO reports the contractor's site camp was established on the lawn adjacent to the current jetties. A storage container was set up for storage and placement of the construction material. |

|           |                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                      |
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| 4.2       | Ablution facilities (chemical toilets) are to be provided on-site for use of the staff. These are to be located away from the river, secured so that they cannot blow away and be serviced regularly.                                                                                        | According to the ECO reports supplied, a sufficient number of chemical toilets were provided.                                                                                                                        |
| 4.3       | A fenced-off area/bin with a secure lid must be created within the campsite for refuse and waste management.                                                                                                                                                                                 | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.                                                                                                      |
| 4.4       | Refuse is to be collected in two separate containers, one for recyclable materials (glass, metal, paper and plastic) and the other for non-recyclable materials. These are to be disposed of at the various approved waste disposal sites.                                                   | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.                                                                                                      |
| 4.5       | Recycle - any timber poles that can be reused need to be stockpiled separately.                                                                                                                                                                                                              | All timber poles were rotten and removed accordingly.                                                                                                                                                                |
| 4.6       | No open fires are to be permitted.                                                                                                                                                                                                                                                           | No evidence of fires was reported by the ECO.                                                                                                                                                                        |
| 4.7       | Storage of all materials required for the contract must occur within this campsite.                                                                                                                                                                                                          | According to the supplied ECO reports the contractor's site camp was established on the lawn adjacent to the current jetties. A storage container was set up for storage and placement of the construction material. |
| 4.8       | Silt protection measures around stockpile sites will be required where materials pose a risk of washing/ blowing into the Keurboom River.                                                                                                                                                    | A silt curtain was installed during construction.                                                                                                                                                                    |
| 4.9       | <b>No</b> construction material is to be stored outside of the site camp/boundary.                                                                                                                                                                                                           | Complied with during the construction phase.                                                                                                                                                                         |
| <b>5.</b> | <b>Noise Management</b>                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                      |
| 5.1       | The contractor must comply with the regulations pertaining to noise. SANS 10400 is applicable.<br>Contractor and staff are only permitted to work Mondays to Fridays (07:00 – 17:00). No work on public holidays or weekends permitted to avoid disturbance to local residents and visitors. | According to the supplied ECO report, work only took place during the appropriate tidal schedule and working hours.                                                                                                  |

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                     |
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| 5.2       | Work hours will be determined by the tidal fluctuations and periods when the work area is accessible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | According to the supplied ECO report, work only took place during the appropriate tidal schedule and working hours. |
| <b>6.</b> | <p><b>Method Statements</b></p> <p>The contractor and Site Agent shall, prior to the commencement of activity involving construction, maintenance or rehabilitation, give the ECO a written plan setting out the following:</p> <ul style="list-style-type: none"> <li>• Construction methods anticipated</li> <li>• Location of the construction camp (should it be required)</li> <li>• Solid waste</li> <li>• Wastewater</li> <li>• Erosion and sedimentation/destabilisation control</li> <li>• Access to the site (as per the EMPr)</li> <li>• Fire control</li> <li>• Signage</li> </ul> <p>The ECO is to approve the method statement before the work may commence.</p> | According to the ECO, no method statements were required.                                                           |
| <b>7.</b> | <b>Waste Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                     |
| 7.1       | The contractor shall ensure that all site personnel are instructed in the proper disposal of all waste. The contractor shall ensure that sufficient disposal facilities are available (to be located on San Marino's property and in close proximity of the working area). Recycling must be encouraged on site and recycling bins must be provided and clearly marked.                                                                                                                                                                                                                                                                                                        | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.     |
| 7.2       | Disposal of all waste materials must be done at suitable facilities.<br><b>No dumping of any waste material on or off site is permitted.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.     |
| 7.3       | The contractor shall ensure that the site is maintained in a <b>neat and tidy condition</b> and kept free of litter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.     |

|           |                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                       |
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| 7.4       | The waste storage area shall be fenced off to prevent wind-blown litter.                                                                                                                                                                              | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.                                                                                                                                                                                                                                                                       |
| 7.5       | <b>All refuge bins</b> must be cleaned on a regular basis and before the start of the weekend (Friday afternoons - closing time).                                                                                                                     | According to the ECO reports supplied, proper waste management was implemented throughout the project timeline.                                                                                                                                                                                                                                                                       |
| 7.6       | <b>Creosote poles</b> that will be removed from the existing structure are to be re-used on the premises or within the local area as fencing or for other appropriate uses (not to be used within any water resources).                               | <b>The pre-existing mooring poles were removed and replaced.</b> Creosote poles that had been extensively heat treated and aged were used. As a result of the steepness and distance from the bank to the new position of the pole, a machine was used at low tide. All 19 new poles were installed during low tide over two days (19 <sup>th</sup> and 20 <sup>th</sup> April 2023). |
| <b>8.</b> | <b>Ablution Facilities</b>                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                       |
| 8.1       | The contractor must provide a chemical ablution facility for construction personnel working on site. One (1) facility for every 15 persons on site is required.                                                                                       | According to the ECO reports supplied, a sufficient number of chemical toilets were provided.                                                                                                                                                                                                                                                                                         |
| 8.2       | Toilets shall be of a neat construction and shall be provided with doors and locks and shall be secured to prevent them from blowing over.                                                                                                            | According to the ECO reports supplied, a sufficient number of chemical toilets were provided.                                                                                                                                                                                                                                                                                         |
| 8.3       | The contractor shall ensure that the toilet(s) are emptied regularly and also before weekends and public holiday periods.                                                                                                                             | According to the ECO reports supplied, a sufficient number of chemical toilets were provided.                                                                                                                                                                                                                                                                                         |
| <b>9.</b> | <b>Fire Protection</b>                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                       |
| 9.1       | No open fires or naked flames for heating or cooking shall be allowed anywhere on site.                                                                                                                                                               | No evidence of fires was observed or reported during the construction period by the ECO or during the operational and rehabilitation phase,                                                                                                                                                                                                                                           |
| 9.2       | The contractor shall ensure that all personnel are aware of the fire risk and the need to extinguish cigarettes before disposal.<br><b>Cigarettes may not be disposed of onsite and must be disposed of properly in receptacles for this purpose.</b> | The necessary training was received during the construction phase.                                                                                                                                                                                                                                                                                                                    |

|                    |                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                    |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9.3                | The contractor shall identify the authorities responsible for fighting fires in the area and shall liaise with them regarding procedures should a fire start. The contractor shall ensure that his staff are aware of the fire danger at all times and are aware of the procedure to be followed in event of a fire.                                  | The necessary training was received during the construction phase. Emergency contacts were also provided.                                                                                                                                                          |
| <b>10.</b><br>10.1 | <b>Packing and Placing of Reno-Mattress</b><br>The reno-mattresses are to be packed within the designated work areas (lawns) and to be carried to the bank for placement by a small machine and rapid attachment and anchoring.                                                                                                                       | Please refer to ECO reports no. 1, 3, and 4 which provide photographic evidence of packaged reno-mattresses, and the machinery used for placement. During the site audit, construction and rehabilitation were completed.                                          |
| <b>11.</b><br>11.1 | <b>Topsoiling Reno-Mattress</b><br>The placement of topsoil over the reno-mattresses ensures that good vegetation cover can be achieved.<br>The stockpiled topsoil is to be placed over the reno-mattresses to a depth of 20 cm. This will subside into the mattresses over time, but plant roots will bind the soil and keep the mattresses covered. | In ECO report no. 5, the contractors placed a layer of in-situ organic material on top of the reno-mattresses.                                                                                                                                                     |
| <b>12.</b><br>12.1 | <b>Rehabilitation: Planting of the Riverbank</b><br>Planting of indigenous plants to create a riparian zone along the reno-mattress construction will add further stability to the banks and improve the general biodiversity and ecological connectivity of the riverbanks.                                                                          | During the site audit, the riverbank was established with kweek and Kikuyu grass along with yellowwood trees. The reno-mattresses have been successfully revegetated with <i>Tetragonia</i> . <i>Zostera</i> has also been established along the floating jetties. |



## CONCLUSION

Based on the information obtained and a site visit conducted on the 9<sup>th</sup> of February 2025, the applicant has sufficiently complied with the conditions of the Environmental Authorisation and EMPr. Furthermore, the EMP is considered adequate and effective to manage and mitigate the activities.

No specific contradictions between the EA and EMP were noted.

This external audit report did not identify any significant non-compliance with the conditions of the Environmental Authorisation.

Any partial non-compliance with the EMPr have been noted within Table 4.

The outcome of this audit has not found insufficient mitigation of environmental impacts associated with the undertaking of the listed activities, nor has it found insufficient levels of compliance with the Environmental Authorisation. As such a public participation process in terms of Regulation 34(5) will not be undertaken.

In compliance with regulation 34(6) the holder of the EA must within 7 days of the date of submission of an environmental audit report to the competent authority, notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available –

- (a) to anyone on request; and
- (b) on a publicly accessible website, where the holder has such a website.

Compiled by:

A handwritten signature in black ink, appearing to be 'Renier Kapp', written over a light blue grid background.

Renier Kapp  
for KAPPEC

## ANNEXURE A – SITE PHOTOGRAPHS



Condition of the slipway from the road-side.



Condition of the slipway.



Bottom of the slipway during low tide as seen towards the north.



Bottom of the slipway during low tide as seen towards the south.



Vegetation debris at the bottom of the slipway.



Condition of the slipway.





The northern end of the jetty showing the completed layers of the .



Weinstalled mooring poles.



Established *Zostera* along the base.



Successfully installed mooring poles.



Revegetated reno-matresses.



Revegetated reno-matresses.





Completed jetty showing the gang-plank, jetty and fingers as seen towards the south.



Successfully completed and operational jetty as seen towards the south.



Revegetated reno-matresses.



Revegetated reno-matresses.



The 5m gap in between the mooring fingers.



Successfully completed and operational jetty as seen towards the south..





Attached floating jetty and mooring finger.



The southern end of the San Marino jetty and the northern end of the Blue Waters River Estate jetty.



Condition of the jetty and the reno-matresses on low tide as seen towards the north.



Attached floating jetty and the 4-meter-long by 0.7-meter-wide mooring finger.



Attached floating jetty and mooring fingers with the 5m gap as seen towards the north.



Condition of the jetty showing the gang-planks on low tide as seen towards the north.





Reno-mattress toe at the bottom of the riverbank.



Rehabilitation of the riverbank.



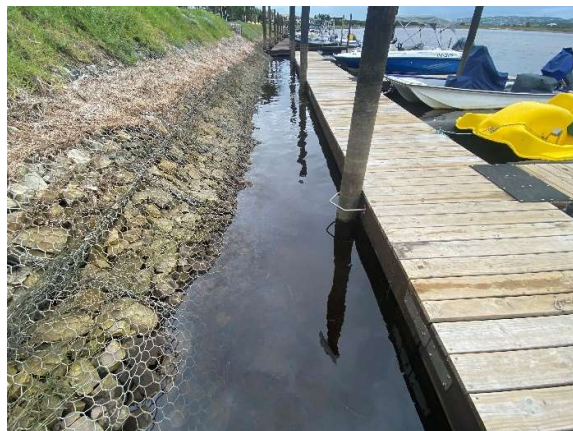
Rehabilitation of the riverbank.



Rehabilitation of the riverbank.



Tie-in point with Blue Waters.



Reno-mattress toe at the bottom of the riverbank.