

THE PROPOSED DEVELOPMENT OF A PRIMARY DWELLING AND ASSOCIATED STRUCTURES AND INFRASTRUCTURE ON ERF 4716, GROOT BRAK RIVER.

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

DEA&DP EIA REF. NO. 16/3/3/1/D6/17/0020/22
NEAS REF. NO. WCP/EIA/0001142/2022



Prepared for:

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KAPPEC

15 May 2025

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report.
Date Submitted	15 May 2025
Public Review Period	Not Applicable
Report Title	The Proposed Development of a Primary Dwelling and Associated Structures and Infrastructure on erf 4716, Groot Brak River.
Applicant	The Director: New Beginning 17 (Pty) Ltd Mr. W. Nel 233 Blue Crane Drive West Lake Country & Safari Estate Skeerpoort 0232 Mobile: 083 287 1044 E-mail: nelw@pminc.co.za
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 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, dark grey font.	

DISCLAIMER

This report has been prepared for the Director of New Beginning 17 (Pty) Ltd., represented by Mr W. Nel 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 Principle Environmental Assessment Practitioner

Kapp Environmental Consultants (Pty) Ltd (KAPPEC)

Name of Company

15 May 2025

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

Appendix A:	Site Photographs
Appendix B:	Locality Map
Appendix C:	Copy of EA
Appendix D:	Copy of EMPr
Appendix E:	Commencement Notification and I&AP Database
Appendix F:	ECO reports
Appendix G:	OSCAE Permit
Appendix H:	NFA Permit

INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by the Director of New Beginning 17 (Pty) Ltd., represented by Mr W. Nel (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 18 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to New Beginning 17 (Pty) Ltd. on March 23, 2023 (DEA&DP EIA Ref: 16/3/3/1/D6/17/0020/22) in terms of the National Environmental Management Act, 1998 (Act 107 Of 1998) and the Environmental Impact Assessment 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 EMPr. The body of this report will incorporate the auditable conditions and requirements contained in both the EA and the EMP 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 (17 March 2025)
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report (15 May 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 proposed development entails the clearance of indigenous vegetation for the construction of the primary dwelling and associated structures and infrastructure. Additionally, the development will involve the construction of structures and infrastructure within 100 metres of the high-water mark of the sea.

The specific details of the proposed development on the property include the following:

- **Primary House, Driveway, Parking, and Garden (South of the Road): 2,955.52m²**
 - Associated infrastructure, garden area, and installation of a fence.
 - Located adjacent to (south of) the MR6817 bisecting the property.
 - All components are more than 100m from the high-water mark of the ocean.
 - Access to the house will be gained from the MR6817 and driveway.
 - The main dwelling is proposed on the dune on lower ground and south of the road.
- **Outbuilding and Driveway (North of the Road): 567.18m²**
 - Includes a garage and staff room.
 - Located adjacent to the MR6817.
 - Designed to avoid any disturbance to the remaining Milkwood trees.
 - Access will be gained from the MR6817 and driveway.
- **Raised Boardwalk and Deck:**
 - Short boardwalk (18m x 1.2m) leading from the primary house to a small viewing deck (5m x 5m) near the southern boundary overlooking the ocean.
 - The boardwalk will meander through the vegetation and follow the contours, with the exact position determined on-site to avoid key trees.
 - The viewing deck will include a boma.
 - Located within 100m of the high-water mark of the ocean.
- **ClearVu Fence Installation:**
 - Installed as per the site plan.
 - The southern boundary fence, if any, will be located at the 100m mark from the high-water mark.
 - Temporary disturbance area for fence installation: approximately 191m².

Environmental Considerations

- Total Clearance of Indigenous Vegetation: **Approximately 3,760.3m²**
- Total Property Size: **16,274m²**
- Municipal Road Bisecting Property: **800m²**
- Property Size Without Road: **15,424m²**
- Percentage of Property Disturbed: **24.4%**

- **Percentage of Property Retained Natural:** 75.6%
- The proposed development is located on a stabilised dune that drops off in elevation towards the sea, with the main dwelling positioned on lower ground south of the road and the garage at the top of the dune, at the same base height as the road.

Associated Infrastructure

- **Electricity:** Solar infrastructure will be installed.
- **Sewage:** Conservancy tanks will be installed as indicated on the SDP, with municipal collection and treatment. A pipe pump point will be provided for municipal tanker connection, eliminating the need for vehicles to enter the property.
- **Water:** Rainwater harvesting tanks are included in the design. In case of rainwater shortage, potable municipal water will be purchased and delivered by a municipal water tanker to fill the storage tanks.
- **Refuse:** Waste will be collected by the municipal waste stream.
- **Fencing:** ClearVu fencing will be installed as indicated on the SDP (not on the property boundary). Any fence south of the house must be positioned at the 100m mark from the high-water mark.
- **Garden and Lawn Areas:** Surrounding each structure, these areas will be fenced as per the SDP.

The remainder of the property will be preserved and managed for conservation purposes, ensuring that indigenous vegetation outside the designated development areas remains undisturbed.

LISTED ACTIVITIES

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

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.

A raised boardwalk and viewing deck will be constructed south of the primary dwelling, within 100m of the high-water mark (HWM) of the sea.

- *The boardwalk, which will connect the house to the deck, will be elevated 1m above ground, measuring approximately 1.2m in width and 18m in length, covering an area of 21.6m².*
- *The viewing deck will have a reduced footprint of 5m x 5m, totaling 25m².*

In response to DEADP's request for ecological corridors to facilitate wildlife movement, the applicant

has adjusted the design by shifting the viewing deck and fence 10m back from the property boundary and reducing the deck's size. As per the Environmental Authorisation (EA), the fence south of the house must be positioned at the 100m mark from the HWM, with the option to include a small gate for access.

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

Activity Number: 12

Activity Description:

The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan

i. Western Cape

- i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;
- ii. Within critical biodiversity areas identified in bioregional plans;
- iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;
- iv.

On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or

- v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.

The total area to be cleared for the construction of the primary dwelling, associated infrastructure, outbuilding with staff ablution facilities, viewing deck, and boardwalk exceeds the 300m² threshold listed under Listing Notice 3, Activity 12.

Clearing for the primary dwelling and associated structures

- *This includes the house, outbuilding, boardwalk, and all fencing.*
- *The property is mapped as Endangered Hartenbos Dune Thicket (2022 classification).*
- *As a result, vegetation clearing falls under Section 52 of NEMBA, with some of the clearance occurring within 100m of the high-water mark (HWM).*

Clearing within 100m of the HWM

- The boardwalk, viewing deck, and fence will be constructed within this 100m zone.
- Although vegetation clearing will occur, the area to be cleared for these structures is less than 300m², meaning this specific listed activity is no longer applicable.

However, when considering the cumulative impact—including the house, fencing, boardwalk, and deck—more than 300m² of a mapped Endangered Ecosystem (albeit in a secondary transformed state) will be cleared, as confirmed by the specialist assessment.

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: 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.
- a) 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 a 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 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 and the progress of the rehabilitation;
- i) include a photographic record of the site(s) applicable to the audit; and
- j) be informed by the ECO reports.

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	This Environmental Authorisation is granted for the period from date of issue until 31 March 2028 (validity period), during which period the Holder must ensure that the — (a) physical implementation of all the authorised listed activities is started with and concluded at the site; (b) construction monitoring and reporting requirements are undertaken at the site and submitted to the Competent Authority in time to allow said authority to process such documents timeously; (c) post construction rehabilitation and monitoring requirements is undertaken and completed at the site; and (d) environmental auditing requirements are complied with; and that such auditing is finalised in time to allow the competent authority to be able to process the environmental audits timeously within the specified validity period.	DEA&DP was notified of the intended commencement of work on April 24, 2023. The ECO subsequently informed DEA&DP of the project's completion on February 11, 2025. However, the contractor was still in the process of finalising the remaining SNAG items. The final ECO monitoring report was submitted to the department on Wednesday, 12 March 2025. Complied with. Complied with. Complied with.
2.	The construction phase of the Environmental Authorisation is subject to the following: 2.1 The Holder must finalise the post construction rehabilitation and monitoring requirements within a period of 3-months from the date the development activity (construction phase) is concluded.	DEA&DP was notified of the project's completion on February 11, 2025, with the contractor finalising the remaining SNAG items thereafter. The final ECO monitoring report was submitted to the department on March 12, 2025.

		In accordance with the requirement that post-construction rehabilitation and monitoring be completed within three months of the conclusion of development activities, rehabilitation and final monitoring were completed within a one-month period, well within the stipulated timeframe.
3.	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 16 January 2023 on the site as described in Section C above. This Environmental Authorisation is only for the implementation of the Preferred Alternative, which entails: The Holder is herein authorised to undertake the following activities that includes the listed activities as it relates to the clearance of indigenous vegetation for the construction of the primary dwelling and associated structures and infrastructure. Also, the development of structures and infrastructure within 100 metres of the high water mark of the sea. The specific details of the proposed development on the property comprises of the following: Primary house, driveway, parking and garden south of the road – 2955.52m²; Outbuilding and driveway north of the road – 567.18m²; Raised boardwalk and deck – approximately 50m²;	Noted. The parameters outlined in the EA have been implemented accordingly as set out in the approved Municipal Design plans included in Figures 1 and 2. The remainder of the site has not been cleared, although Rooikrans was removed by hand.

	The total clearance of vegetation will be approximately 3760.3m². The remainder of the property will not be cleared of indigenous vegetation and will be managed for a conservation use. The development must be implemented in accordance with the layout developed by Ryan Hamilton Architectural Design (dated January 2023) Drawing number MD08 (Annexure 2) subject to the specific development parameters.	
4.	This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme ("EMPr").	Based on the ECO reports obtained as well as the site visit conducted, both the EA and approved EMPr were successfully implemented on-site throughout.
5.	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 held all responsibility for the actions undertaken by anyone on site.
6.	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.
7.	The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 7.1. notify all registered Interested and Affected Parties ("I&APs") of	The I&AP Notification Letter was sent on March 24, 2023, one day after the Environmental Authorisation (EA) was granted.

- 7.1.1. the decision reached on the application; 7.1.2. the reasons for the decision as included in Annexure 3; 7.1.3. the date of the decision; and 7.1.4. the date when the decision was issued. 7.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below; 7.3. draw the attention of all registered I&APs to the manner in which they may access the decision; 7.4. provide the registered I&APs with the: 7.4.1. name of the Holder (entity) of this Environmental Authorisation, 7.4.2. name of the responsible person for this Environmental Authorisation, 7.4.3. postal address of the Holder, 7.4.4. telephonic and fax details of the Holder, 7.4.5. e-mail address, if any, of the Holder, 7.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended). 7.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision. 7.6. 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,	All required information was included in accordance with the stipulated conditions. No appeals have been lodged against the EA. Confirmation of such was sent by Marius Venter from DEA&DP on the 18th of April 2023.
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	must not commence until the appeal is decided.	
8.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities. 8.1. The notice must make clear reference to the site details and EIA Reference number given above. 8.2. The notice must also include proof of compliance with the following conditions described herein: Conditions no.: 7, 10 and 12.	DEA&DP was notified of commencement on April 24, 2023. A notification of commencement was sent to DEA&DP on 24 April 2023, 1 month prior to commencement and made clear reference to the site details, EIA Reference, and proof of compliance. Condition 7: The I&AP Notification Letter was sent on March 24, 2023, one day after the Environmental Authorisation (EA) was granted. Condition 10: The final EMPr was submitted to DEA&DP for approval on the 24th of April 2023. DEA&DP approved the amended EMPr on 9 May 2023. Condition 12: HilLand Environmental was appointed as ECO on the site and submitted monthly reports.
9.	Seven calendar days' written notice must be given to the Competent Authority on completion of the construction activities.	DEA&DP was notified of the project's completion on February 11, 2025, with the contractor finalising the remaining SNAG items thereafter. The final ECO monitoring report (no. 14) was submitted to the department on March 12, 2025.
10.	The draft or Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation must be amended and submitted to this Department for approval prior to commencement of any activities on the site: 10.1. The EMPr must be amended to incorporate the following — 10.1.1. Incorporate all the conditions given in this Environmental	The final EMPr was submitted to DEA&DP for approval on the 24th of April 2023. DEA&DP approved the amended EMPr on 9 May 2023. Compliant

	Authorisation; 10.1.2. All monthly ECO reports to be submitted to the competent authority. 10.1.3. Include the auditing schedule as set out by this Environmental Authorisation. 10.1.4. A revised site development plan reflecting all specific development parameters.	Compliant Compliant Compliant
11.	The EMPr must be included in all contract documentation for all phases of implementation.	A copy of the EA and required final EMPr was made available to the contractor by the applicant.
12.	The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	HilLand Environmental was appointed as ECO on the site and submitted monthly reports to DEA&DP.
13.	The ECO must– 13.1. be appointed prior to commencement of any works (i.e. removal and movement of soil); 13.2. ensure compliance with the EMPr and the conditions contained herein; 13.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO; 13.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised. 13.5. the ECO must conduct site inspections at least every 2 (two) weeks and must submit ECO Monitoring Reports on a monthly basis to the competent authority.	HilLand Environmental was appointed as ECO on the site and submitted monthly reports to DEA&DP during the construction and rehabilitation phase.

14.	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.	At the time of the site audit, the development has been completed. The ECO notes that the EA and EMPr were part of the contract documents which were kept on file at the site.
15.	Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	Access to the site referred to in Section C was granted, the environmental reports were presented to the Competent Authority during construction.
16.	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.
17.	17. 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: 17.1. Auditing during the non-operational phase (construction activities): 17.1.1. 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. 17.1.2. A final Environmental Audit Report for the construction phase	Kapp Environmental Consultants (KAPPEC) has been appointed by the Director of New Beginning 17 (Pty) Ltd., represented by Mr W. Nel (the Applicant) as independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

	(non-operational component) must be submitted to the Competent Authority within three (3) months of completion of the construction phase.	The external audit was conducted on the 17 th of March 2025.
18.	The Environmental Audit Report(s), must – 18.1. 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; 18.2. provide verifiable findings, in a structured and systematic manner, on – 18.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 18.2.2. 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. 18.3. identify and assess any new impacts and risks as a result of undertaking the activity; 18.4. evaluate the effectiveness of the EMPr; 18.5. identify shortcomings in the EMPr;	18.1. Kapp Environmental Consultants (KAPPEC) has been appointed by the Director of New Beginning 17 (Pty) Ltd., represented by Mr W. Nel (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). The external audit was conducted on 17th of March 2025. 18.2. Please refer to the site findings and Tables 3-5 for the findings recorded for the EMPr, and associated OSCAE permit and NFA permit.

	18.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 18.7. 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; 18.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation; 18.9. include a photographic record of the site applicable to the audit; and 18.10. be informed by the ECO reports.	18.7. DEA&DP was notified of the intended commencement of work on April 24, 2023. Pegs to demarcate the building footprint were installed on 24 April 2023. Vegetation clearing and plant rescue took place from 25 April to 5 May 2023. Environmental induction with the construction team was conducted on 8 May 2023. The ECO subsequently informed DEA&DP of the project's completion on February 11, 2025. However, the contractor was still in the process of finalising the remaining SNAG items. The final ECO monitoring report was submitted to the department on Wednesday, 12 March 2025. 18.8. According to Environmental Monitoring Report No. 14 of the ECO, rehabilitation commenced around December 2023 after the construction of the residence was completed. The ECO subsequently informed DEA&DP of the project's completion on February 11, 2025. However, the contractor was still in the process of finalising the remaining SNAG items. 18.9. Please refer to Appendix A. 18.10. Please refer to Appendix F
19.	The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website.	Noted and to be complied with as part of circulating this audit report.
20.	The holder must adopt and implement the following specific	Following a walkthrough site visit conducted on March 17, 2025,

	development parameters: 20.1. The security fence on the southern portion of the property must be aligned to the 100 metres from the high-water mark of the sea as per the survey done by CDJ Land Surveyors (Ref Gf225-Sketch plan, dated 23 September 2022). A gate may be installed to gain access to the boardwalk and viewing deck. 20.2. The remaining security fences on the portion of property located south of the road MR6817 must follow the alignment which is setback from the boundary line as depicted on the Site Development Plan. No fences may be erected on the eastern and western property boundaries. 20.3. The security fence on the portion of the property located on the north of the road must follow the alignment as depicted on the Site Development Plan (See Annexure 2). 20.4. All ecological corridors must be managed for conservation use.	the following observations were made regarding compliance with the specified conditions: 20.1 The security fence on the southern portion of the property has been aligned to the 100-metre setback from the high-water mark, as per the survey conducted by CDJ Land Surveyors (Ref: Gf225-Sketch plan, dated September 23, 2022). A gate has been installed to allow access to the boardwalk and viewing deck, in accordance with the approved design. Additionally, the surrounding vegetation is being actively rehabilitated. 20.2 No fences have been erected on the eastern and western property boundaries, in compliance with this condition. The fencing on the portion of the property south of MR6817 follows the setback alignment as depicted in the Site Development Plan, with only an entrance fence and a porch fence with an access gate in place. 20.3 The security fence on the northern portion of the property has been installed in alignment with the Site Development Plan (Annexure 2). 20.4 Ecological corridors on the property are being managed for conservation purposes. Rooikrans (<i>Acacia cyclops</i>), an alien invasive species, has been removed, and Vygies (succulent ground cover) have been transplanted onto the dune slopes adjacent to the boardwalk to aid in rehabilitation. These efforts support ecological restoration and habitat integrity towards the north, east, and south of the property.
21.	Should any heritage remains be exposed during excavations or any	No heritage remains were exposed during excavations as per

other actions on the site(s), 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. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority. Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.	the ECO reports provided.
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TABLE 3: LICENCE-WC-GR-00126-2023-24 - NFA PERMIT CONDITIONS

No.	DFFE PERMIT CONDITIONS	COMPLIANCE FINDING
1.	General licence rules This licence is – (a) not transferable (you cannot pass, or cede it to another person), and (b) only valid for the period it was issued for.	Complied with, the original holder remained the holder throughout the project. The permit remained valid until the 30 th of January 2024. All conditions were met during that time.
2.	Showing this licence (a) You must produce this licence together with your valid identity document on demand to any forest officer or police officer. (b) The person(s) moving or transporting timber or other products on your behalf, must at all times be in possession of a certified/stamped copy of this licence. (c) Distributors/wholesalers of firewood/braai wood must provide all of their retail clients with a certified/stamped copy of this licence, who have to produce it on demand to any forest or police officer.	Complied with.
3.	Indigenous/ protected forest tree Seedling rescuing (of those seedlings falling within the footprint) to be conducted prior to construction activity and be replanted on above property.	Once the disturbance footprint was marked by the surveyor, plant search and rescue, along with vegetation clearing, commenced. These activities took place between April 25 and May 5, 2023. All protected Milkwood and Cheesewood trees located within and around the approved development footprint were clearly demarcated to ensure they remain undisturbed throughout the construction phase. Additionally, a single multi-stemmed Milkwood tree situated within the garage footprint (northern section) was transplanted.
4.	The protected/ indigenous trees falling outside the footprint area to be retained.	All protected Milkwood and Cheesewood trees located within and around the approved development footprint were clearly

		demarcated to ensure they remain undisturbed throughout the construction phase. Additionally, a single multi-stemmed Milkwood tree situated within the garage footprint (northern section) was transplanted.
5.	Table-topping" i.e. flattening/ leveling of remaining protected/ indigenous trees crowns are not allowed.	During the site visit, it was observed that screening vegetation, including Milkwood trees, had been planted along the site boundaries in accordance with the visual specialist's recommendations. These conservation efforts were found to be in good condition, with the Vygies on the dune slopes thriving and actively contributing to stormwater management and erosion control on the eastern portion of the site. However, during the construction phase, a transgression occurred in which the contractors damaged the transplanted Milkwood tree. In response, the applicant took corrective action by purchasing and planting multiple Milkwood trees both on and adjacent to the property to compensate for the loss. Regarding the requirement prohibiting "table-topping" (i.e., the flattening or leveling of the crowns of protected and indigenous trees), all remaining indigenous trees on-site have been preserved in their natural form. The ecological corridors to the north, east, and south are being maintained as per conservation requirements, and no unauthorized pruning or alteration of tree canopies has been undertaken.
6.	Roots of remainder protected/ indigenous trees may not be disturbed.	Complied with. All remaining indigenous trees on-site have been preserved in their natural form. The ecological corridors to the north, east, and south are being maintained as per conservation

		requirements, and no unauthorized pruning or alteration of tree canopies has been undertaken.
7.	No sand/ rubble/ cement/ building material allowed within the dripline of remaining protected/ indigenous trees.	Milkwood and Cheesewood trees located outside the disturbance footprint were marked with danger tape and have remained undisturbed throughout the construction process. Additionally, no record of sand, rubble, cement, or building materials being placed within the dripline of any remaining protected or indigenous trees was reported in any of the ECO reports.
8.	Footprint area to be demarcated with danger tape or shade cloth to avoid any miscommunication or unnecessary clearing.	The footprint area was properly demarcated with danger tape and shade cloth to prevent any miscommunication or unnecessary clearing. The contractor ensured the installation and maintenance of the demarcation for the housing footprint south of MR6817, in line with the surveyor's pegged disturbance footprint. However, several wooden poles and sections of the shade netting were reported stolen multiple times throughout the project. The owner reported these incidents to SAPS and the Mossel Bay Municipality. Despite these efforts, theft remained an ongoing challenge.
9.	It is the responsibility of the applicant to liaise with the landowner if the affected tree is on private land.	The Milkwood tree was located within the garage footprint and therefore not located on private property but within the approved development footprint. As per the ECO's recommendations in Report No. 8, the rescued Milkwood trees were transplanted towards the west of the footprint. The ECO also requested that the rescued milkwood trees be properly demarcated to prevent accidental damage and that the construction site (garage site)

		be demarcated with green shade netting.
10.	Knowledgeable, experienced and qualified Horticulturist to conduct and oversee transplantation process - as well as care for protected trees after transplanting in order to ensure survival. In instances, where transplantation is not successful protected tree to be replaced with one Milkwood seedling.	Complied with. However, during the construction phase, a transgression occurred in which the contractors damaged the transplanted Milkwood tree. In response, the applicant took corrective action by purchasing and planting multiple Milkwood trees both on and adjacent to the property to compensate for the loss.
11.	Knowledgeable, experienced and qualified Environmental Consultant to be appointed as Environmental Control Officer (ECO) to oversee all activities.	Complied with. HillLand Environmental was appointed as ECO on the site and submitted monthly reports.
12.	Owner/ ECO to provide a monthly photo monitoring report for duration of the project.	Complied with, please refer to Appendix F for the ECO reports.
13.	Forestry officers and other relevant stakeholders should at all times be permitted to monitor the compliance.	Access was permitted to all environmental officers. Regular monitoring reports were sent by the ECO to the competent authority.
14.	Failure to comply with the rules and conditions stated herein will be subjected to the withdrawal of this licence or lead to legal action being taken against the applicant.	Noted, all conditions as set out in the NFA permit were complied with.

TABLE 4: OSCAE PERMIT CONDITIONS

No.	DFFE PERMIT CONDITIONS	COMPLIANCE FINDING
1.	All waste produced during the activity (including building rubble and plant material) must be removed from site and disposed of at the Great Brak Municipal waste site.	Waste and building rubble were within appropriate bins during the construction phase and disposed of at the municipal waste site.
2.	The applicant must, if possible, conduct a search and rescue of indigenous vegetation.	A search and rescue operation was undertaken from the 25 th of April 2023 to the 5 th of May 2023.
3.	The site must be checked for any nesting birds or animals before the activity begins.	According to the ECO reports, the site was checked for any birds nesting during the plant search and rescue operation. No nesting birds were recorded within the development footprints.
4.	Any animals found on site must be noted and reported to Cape Nature and/or moved from the construction area.	As per the ECO reports, no animals required removal.
5.	The applicant must as far as possible, avoid the use of heavy machinery to do the clearing of vegetation.	All vegetation clearing was done by hand using a chainsaw and kapmes.
6.	The applicant must implement measures to ensure that the clearing of vegetation does not lead to any erosion on this property or adjacent property.	No erosion was observed during the site audit or recorded in the ECO reports. A significant amount of Rooikrans (Acacia cyclops), an alien invasive species, has been removed, and Vygies (succulent ground cover) have been transplanted onto the dune slopes adjacent to the boardwalk to aid in rehabilitation.
7.	The site must be declared a 'no smoking zone'. A safe temporary smoking zone must be established.	As per the supplied ECO reports, no smoking outside of the development footprint was observed or recorded.
8.	The areas that are not to be disturbed as listed in the application, must be clearly demarcated prior to the work commencing.	The surveyor pegged the development zones and initially marked them with danger tape for the vegetation clearing phase. Once this phase was completed, the danger tape was replaced with a green shade net for continued demarcation.
9.	On condition that post-development rehabilitation and the future control of listed Alien Invasive species is conducted on this property.	Compliant – the holder has commenced with alien clearing and removal during the rehabilitation phase and will continue these

		efforts indefinitely.
10.	A post-development site photograph is to be sent to this department as and when the development concludes.	Compliant – the final OSCA compliance monitoring report was sent on the 4 th of October 2024.
11.	This authorisation does not exempt the owner from the need to comply with any other applicable legislation.	Noted.
12.	Notwithstanding the approval or condition set out in this OSCA permit may not contradict any conditions or recommendations set out in the EA granted by DEA&DP dating 24 March 2023.	No contradictions were observed during this audit period.
13.	This decision is not transferable, and Mossel Bay Municipality reserves the right to revise the decision if necessary.	Complied with, the original holder remained the holder throughout the project. The permit remained valid until the 20 th of April 2024. All conditions were met during that time.

SITE AUDIT FINDINGS

A detailed site walkthrough was conducted on the 17th of March 2025. Prior to the visit, KAPPEC obtained permission from the applicant, and the applicant accompanied KAPPEC on the day of the audit. The walkthrough focused on assessing compliance with environmental conditions, construction progress, and rehabilitation efforts.

Upon arrival, the outbuilding (garage site) and associated storage structures were observed and found to be in good condition. A ClearVu security fence has been installed to restrict public access. The vegetation surrounding the outbuilding remains in its natural state, with no visible damage. The surrounding area is predominantly covered with *Acacia cyclops* (Rooikrans) and *Searsia crenata*, along with some organic material from previous alien clearing activities.

As part of the visual integration of the development, the visual specialist required additional screening vegetation to soften the built environment and enhance ecological connectivity. Indigenous vegetation has ensured successful screening as well as planted milkwood trees along the western property boundary.

A significant amount of *Acacia cyclops* (Rooikrans) has been removed, and *Drosanthemum* species (vygies) have been successfully planted on the eastern dune slopes adjacent to the boardwalk to aid in rehabilitation and stabilization. The applicant has committed to ongoing alien vegetation clearing using only manual labour. While no heavy machinery will be used, a woodchipper may be utilised to convert dried Rooikrans into mulch, which will further support soil stabilization and rehabilitation efforts. The cut alien vegetation and mulch were used as brushwood to cover exposed areas after clearing.

A ClearVu security fence has been installed along the northwestern, western, and southern sections of the property. Towards the eastern boundary, a gabion retaining wall has been constructed, incorporating an access gate leading to the boardwalk and dune rehabilitation area. Some of the cleared and cut Rooikrans (*Acacia cyclops*) have been stored as firewood beneath the boardwalk. Keeping the area tidy and free of excess debris.

In addition, stormwater dissipation infrastructure has been installed below the gabion structure and remains in good condition, effectively managing runoff and preventing erosion.

As per the ECO reports provided, vegetation clearing and plant rescue operations took place between April 25 and May 5, 2023. To prevent unnecessary clearing, the disturbance footprint was demarcated with green shade netting, and the approved footprint was pegged by the surveyor. During the clearing process, bulbous plants (*Anapalina* species) were collected and have since been replanted as part of the rehabilitation phase. Clearing was carried out using chainsaws and machetes (kapmes), with materials left for collection by the main building contractor. Additionally, all Milkwood (*Sideroxylon inerme*) and Cheesewood (*Pittosporum viridiflorum*) trees located outside the disturbance footprint were marked with danger tape and remain undisturbed.

During the construction phase, a non-compliance incident occurred where contractors damaged a transplanted Milkwood tree (*Sideroxylon inerme*) that had originally been relocated from the garage footprint under a valid permit, due to demarcations not being maintained. In response:

- The applicant took corrective action by purchasing and planting multiple Milkwood trees both on and adjacent to the property to compensate for the loss. These trees also function as screening vegetation, aligning with the visual specialist's recommendations.
- The contractor was issued a non-compliance penalty, and instead of a monetary fine, the following corrective measures were imposed:
 - The contractor was required to purchase either three (3) x 20-liter Milkwood trees or five (5) x 4-liter Milkwood trees (*Sideroxylon inerme*).
 - The newly planted and rescued Milkwood trees must be nurtured (compost, food, and water) for the remainder of the construction phase, ensuring their successful establishment.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 5: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Licences/Permits/Approvals	
1.1	If any pruning, disturbance and / or removal of protected Milkwood and/or Cheesewood trees will be required , an NFA licence application must be submitted to Department of Forestry (Knysna). This application needs to accompany the EA, OSCA permit and building plan approvals.	An OSCAE permit was obtained from the Mossel Bay Municipality on the 21 st of April 2023. A licence was obtained that grants authority under the National Forests Act, 1998 (Act No. 84 of 1998) from 23 August 2023 to 30 January 2024 (LICENCE-WC-GR-00126-2023-24).
2.	Pegging of Disturbance Areas	
2.1	The disturbance areas associated with the primary house and outbuilding must be pegged well in advance by a surveyor prior to the commencement of vegetation clearing activities.	The surveyor pegged the approved disturbance footprints (single residence and outbuilding (garage site)), deck and walkway. The wooden pegs are still in place as evidence along the eastern gabion retaining wall. During the site audit, the outbuilding (garage site) and associated storage structures were observed and found to be in good condition. A ClearVu security fence has been installed to restrict public access.
2.2	Screening needs to go around any such trees and they may NOT be disturbed during the build.	As per the ECO reports, Milkwood and Cheesewoods outside the disturbance footprint were marked with danger tape and remained undisturbed.
3.	Setting out of Disturbance Areas Associated with the Boardwalk and Viewing Deck	
3.1	The boardwalk & fence must meander around vegetation and trees (following the path of least disturbance). The viewing deck must be placed in a disturbed area.	The majority of the area where the boardwalk was constructed was previously disturbed, primarily covered with Rooikrans (<i>Acacia cyclops</i>), which has since been cleared. The surrounding area is now undergoing rehabilitation, with vygies (<i>Carpobrotus</i>

		species) successfully planted to stabilize the soil and support ecological restoration. The cleared and cut Rooikrans have been stored as firewood beneath the deck, making practical use of the removed alien vegetation while keeping the area free of excess debris.
3.2	The contractor should note that the construction of the boardwalk and viewing deck must be done by hand. NO HEAVY MACHINERY will be allowed south of the disturbance area associated with the primary house. The timber support poles are to be augured into the ground with limited excavation and or movement of sand.	Only chainsaws and hand tools were used during the construction process. According to the applicant, the installation of the boardwalk and viewing deck along with rehabilitation was carried out entirely by hand.
4.1	Disturbance area associated with the garage area – no encroachment beyond the working zone highlighted, except for driveway and sewage pipeline installation (where a limited working area will be allowed)	Complied with as per the ECO reports. The working footprint remained as small as possible with compliance monitoring during construction. Refer to ECO report no. 11 for further elaboration.
4.2	Limited pruning associated with the construction of the boardwalk and viewing deck – limited working area will be allowed.	The majority of the area where the boardwalk was constructed was previously disturbed, primarily covered with Rooikrans (<i>Acacia cyclops</i>), which has since been cleared. The boardwalk was therefore positioned to follow the path of least disturbance, ensuring minimal impact on the remaining indigenous vegetation. Additionally, the viewing deck has been placed in a previously disturbed area, aligning with the ecological requirements of the site.
4.3	Limited pruning associated with the fence. Approximately 0.5-1m working area allowed on either side of the fence - The working areas must be fenced (shade cloth netting / suitable alternative as per the map below)	All demarcation (green shade netting) was maintained throughout the construction phase around the house footprint.
4.4	Should any endangered species or protected species listed in Schedule 3 and 4, in terms of the Western Cape Nature	A single Milkwood tree was discovered at the garage site prior to clearance and earthworks. A NFA permit application was

	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 not be removed without the relevant permit and licensing.	submitted and approved for the transplantation of the single milkwood tree. However, during the construction phase, a transgression occurred in which the contractors damaged the transplanted Milkwood tree. In response, the applicant took corrective action by purchasing and planting multiple Milkwood trees both on and adjacent to the property to compensate for the loss.
4.5	Vegetation clearing may only commence once the EA/licences/permits are in place.	Complied with.
4.6	Any transplantable species (shrubs, succulents, geophytes etc.) which occur within the construction areas should be either stored in an on-site nursery for later use in the landscaping phase or directly transplanted into the surrounding areas outside of the disturbance areas.	Complied with. Bulbous plants (<i>Anapalina</i> species) were collected during the clearing process and have since been replanted as part of the rehabilitation phase.
4.7	The disturbance areas must be demarcated and silt fencing installed where necessary and indicated by the ECO.	All demarcation (green shade netting) was maintained throughout the construction phase around the house footprint. The gabion retention wall was considered as a sufficient silt fence towards the eastern boundary. The no-go demarcation doubled as a silt trap due to the bottom 200mm of the shade netting being buried into the soil to limit silt movement under the fence.
4.8	For the boardwalk and viewing deck the location is based on the areas already cleared of alien vegetation. The brushwood can be removed to facilitate access for installation of the poles, any other vegetation may only be pruned and not removed.	The majority of the area where the boardwalk was constructed was previously disturbed, primarily covered with Rooikrans (<i>Acacia cyclops</i>), which has since been cleared. The boardwalk was therefore positioned to follow the path of least disturbance, ensuring minimal impact on the remaining indigenous vegetation. Additionally, the viewing deck has been placed in a previously disturbed area, aligning with the ecological requirements of the site.

4.9	All cut vegetation shall be chipped and used as mulch or disposed of off-site at an approved disposal site. Stockpiling of cut vegetation shall only be permitted in areas indicated by the ECO. No cut vegetation shall be burnt on site.	The surrounding area is predominantly covered with <i>Acacia cyclops</i> (Rooikrans) and <i>Searsia crenata</i> , along with copious amounts of dead material from previous alien clearing activities. The applicant has committed to ongoing alien vegetation clearing using manual methods only. While no heavy machinery will be used, a woodchipper may be utilised to convert dried Rooikrans into mulch, which will further support soil stabilisation and rehabilitation efforts. The cut alien vegetation and mulch have been strategically used as brushwood to cover exposed areas after clearing. The cleared and cut Rooikrans have been stored as firewood beneath the deck, making practical use of the removed alien vegetation while keeping the area free of excess debris.
5.	Protection Of Fauna (Animals)	
5.1	The working zones need to be checked for nesting birds before clearance of vegetation commences;	According to the ECO reports, the site was checked for any birds nesting during the plant search and rescue operation. No nesting birds were recorded within the development footprints.
5.2	The removal, damage or disturbance of animals must be avoided. An animal search and rescue prior to the commencement of construction will be required.	No animals were reported to require search and rescue during the construction phase.
5.3	The contractor(s) shall be responsible for ensuring all employees are aware of the need to prevent any harmful effects on wildlife on or around the construction site as a result of their activities. The contractor(s) shall ensure that no hunting, trapping, shooting, poisoning or otherwise disturbance of any fauna takes place.	No wildlife was reported to be harmed.
5.4	Prior to the clearing of vegetation or use of equipment on areas that could be considered habitats or movement corridors for small animals (i.e., grassy verges, clumps of shrubs, trees), animal	No animals were reported to require search and rescue during the construction phase.

	rescue of small, slow-moving species is to be conducted in conjunction with the ECO. Any rescued animals including tortoises and other reptiles are to be safely relocated to a nearby undisturbed natural area that does not form part of the construction area.	
6.	Method Statements Before the contractor begins the contractor and Site Agent shall, prior to the commencement of such activity involving construction, give the ECO a written plan setting out the following: • Location of the construction camp • Storage of construction materials and hazardous substances (if any) • Location of any stockpile sites for topsoil • Location of any stockpile sites for subsoil • Solid waste • Wastewater • Erosion and sedimentation control • Stormwater management • Fire control • Cement and concrete batching The ECO is to approve the method statement before the works may commence.	According to the ECO, there were no formal method statements submitted. Items such as "site camp, stockpile areas, demarcation, silt, and erosion control" were all discussed and approved with the contractor on-site.
7.	Soil Protection	
7.1	As topsoil is a valuable resource, it must be stripped from all construction areas before work commences. (The vegetation roots are to be removed together with the top 20 cm of topsoil is to be stockpiled for use during the rehabilitation phase)	As per the initial ECO reports, topsoil (upper organic layer) was rescued and stockpiled for later use during rehabilitation. The building contractor must ensure that the topsoil is kept separate from any other subsoil or construction material to prevent contamination.

7.2	This topsoil should be stockpiled for use in rehabilitation and landscaping and must not be contaminated with other building materials and/or subsoil.	As per the initial ECO reports, topsoil (upper organic layer) was rescued and stockpiled for later use during rehabilitation. The building contractor must ensure that the topsoil is kept separate from any other subsoil or construction material to prevent contamination.
7.3	This topsoil is to be stockpiled in the designated topsoil stockpile areas, to be agreed on by the ECO (to be located within the disturbed areas as per the site plan).	As per the provided ECO reports the topsoil stockpiles were kept within the working footprint of the single residence.
7.4	The stockpiles should be kept free from weeds and protected against erosion, should it be necessary.	Ongoing alien vegetation clearing was conducted throughout the construction phase, with no signs of erosion observed.
7.5	The soil removed for construction of services (which will all be underground such as the sewage/water network etc.) must not be removed, but placed to the side of the trench, while the sub-soil is placed to the other side. The soil is returned in the same order with the vegetated topsoil closing the trench and stimulating re-growth.	Complied with.
7.6	Stockpiles must be screened and protected from wind and water erosion.	No signs of erosion were observed as per the ECO reports.
7.7	Silt fencing needs to be installed before construction works commence to ensure that there is limited movement of silt on site.	The no-go demarcation doubled as a silt trap due to the bottom 200mm of the shade netting being buried into the soil to limit silt movement under the fence.
8.	Access to the Site	
8.1	Access to the property can be gained via the servitude road bisecting the property (MR6817). Movement of construction vehicles must be restricted to this servitude road and access driveways (driveway(s) at each disturbance area to be used for entrance and exit, no additional driveways) forming part of the site plan. No additional temporary access road may be created.	No additional temporary access roads were created during construction, the MR6817 and proposed residence driveways within the development footprint were used accordingly.

9.	Demarcation of the No-Go Areas	
9.1	All areas outside that of the defined works driveway, disturbance footprint) are deemed a no-go area.	Complied with, all no-go demarcations were in place and were maintained as indicated in the ECO reports
9.2	Disturbance within the work area is to be kept to the minimum, as all disturbed areas will require rehabilitation (placing topsoil and re-seeding to ensure vegetative cover) on completion of the work by the contractor.	The cut and cleared alien vegetation and mulch have been used as brushwood to cover exposed areas after clearing.
9.3	All construction activities must be restricted to the demarcated areas to ensure that no further disturbance into the surrounding vegetation. No encroachment or activities may take place outside the work areas	Complied with, all no-go demarcations were in place and were maintained as indicated in the ECO reports
9.4	Storage sites for construction material and access must be approved by the ECO prior to commencing (to be located within disturbance zone only and areas will require rehabilitation after use).	Complied with. A storage container was placed within the development footprint of the single residence during earthworks and service installations.
9.5	No-Go areas will be required to be demarcated by the contractor to ensure that they are visible at all times, to all personnel. Methods of demarcation will be agreed with the ECO and may include danger tape, rope, fencing, shade cloth, mulch bags, wire fencing etc.	Complied with, all no-go demarcations were in place and were maintained as indicated in the ECO reports. A green shade cloth/netting along with danger tape was used. During the construction phase, a non-compliance incident occurred where contractors damaged a transplanted Milkwood tree (<i>Sideroxylon inerme</i>) that had originally been relocated from the garage footprint under a valid permit, due to demarcations not being maintained. In response: The applicant took corrective action by purchasing and planting multiple Milkwood trees both on and adjacent to the property to compensate for the loss.
9.6	No disturbance may be caused to the undisturbed areas surrounding the demarcated disturbance zone.	Complied with, no such incidents were recorded.

9.7	Adjacent properties to the construction site may not be entered by any construction staff if permission is not granted by the owner.	Complied with, no such incidents were recorded.
10.	Contractor's Site Camp	
10.1	Ablution facilities (chemical toilets) are to be provided at the campsite for use of the staff (one toilet per 15 people).	As per the ECO report, sufficient ablution facilities were provided and maintained.
10.2	A fenced-off area must be created within the campsite for refuse and waste management. 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 (as specified in the OSCA permit – Great Brak Municipal waste site).	According to the ECO reports, waste and building rubble were stored adequately.
10.3	No open fires are permitted.	No evidence of fires were observed.
10.4	Storage of all materials required for the contract must occur within this campsite, or otherwise approved area (by the ECO).	Complied with. A storage container was placed within the development footprint of the single residence during earthworks and service installations.
10.5	Any concrete batching plant areas are to be approved by the ECO prior to utilisation and must be equipped with suitable settling ponds and trapping mechanisms to ensure that contaminated water does not leave the restricted area.	No cement batching took place during the site audit as all construction and rehabilitation were completed. According to the ECO report, cement batching took place within the permanently disturbed area which is now the swimming pool and appropriate bunding was in place near the natural vegetation.
10.6	No ready-mix trucks are permitted to rinse their tanks on site or along the access roads to and from the site. Any spillage is to be immediately cleaned by the responsible contractor / supplier / owner.	The ECO noted that all cement contamination was cleaned up and disposed of appropriately. During the site audit no cement remains were observed.
10.7	No temporary diesel storage tanks should be brought to the site.	Complied with.
10.8	Adequate signage must be erected at the construction site to ensure that safety regulations are adhered to.	Complied with.

10.9	Disposal of all waste materials must be done at suitable facilities. No dumping of any waste material on or off-site is permitted.	According to the ECO reports, waste and building rubble were stored and disposed of adequately.
10.10	The contractor shall ensure that the site is maintained in a neat and tidy condition and kept free of litter (including the adjacent open space area) . At all places of work, the contractor shall provide litter bins, containers and refuse collection facilities for later disposal. Litter to be removed from the site on a daily basis (through daily litter picking before the site is closed for the day). Rubbish bins must be provided on-site and regularly cleaned/emptied.	The ECO repeatedly requested that the contractor conduct chicken parades on an ongoing basis to ensure thorough site cleanup and minimise environmental impact. During the site audit, the site was clear of any litter or construction rubble.
10.11	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. Sanitation provision and servicing shall be to the satisfaction of the environmental control officer (ECO). The contractor shall ensure that the toilet(s) are emptied regularly and also before weekends and public holiday periods.	As per the ECO report, sufficient ablution facilities were provided and maintained.
11.	Storage of Construction Material	
11.1	All stockpile sites to be properly demarcated with silt-fences and/or danger tape, where necessary. Silt protection measures around stockpile sites may be required	The no-go demarcation doubled as a silt trap due to the bottom 200mm of the shade netting being buried into the soil to limit silt movement under the fence. The stockpiles were placed within the development footprint which was appropriately demarcated.
11.2	All construction material should be stored within the site camp/boundary.	Complied with. A storage container was placed within the development footprint of the single residence during earthworks and service installations.
11.3	No hazardous materials to be stored on site like diesel, petrol etc. without written approval by DEADP.	No hazardous materials were stored on site.
12.	Soil Erosion and Stormwater Management	
12.1	Stringent mitigation measures must be imposed during	All construction and rehabilitation have since been completed. As

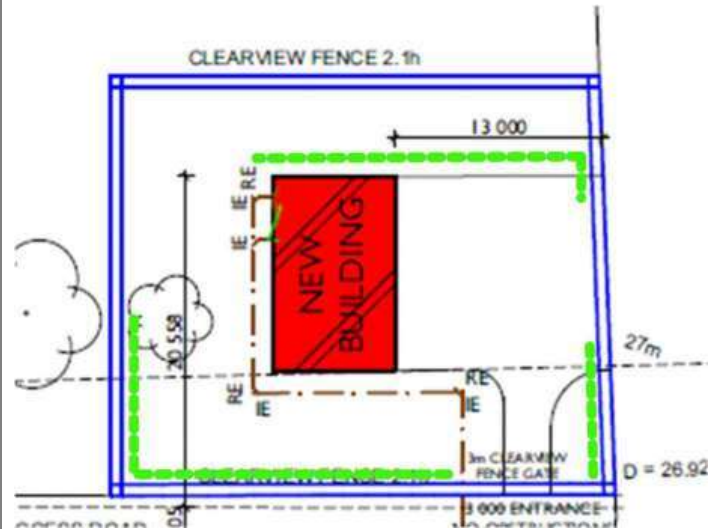
	construction to minimise runoff, possible silt run-off and contamination of water leaving the site (especially into the adjacent 'natural' areas), with the use of silt-fencing, rows of onion bags, mulch, brushwood, sandbags, and deflection berms (the choice depending on the situation). These mitigation measures are essential in all exposed areas.	per the ECO reports, no stormwater runoff or erosion issues occurred during the construction phase and the no-go demarcation doubled as a silt trap due to the bottom 200mm of the shade netting being buried into the soil to limit silt movement under the fence.
12.2	Areas requiring erosion control mechanisms are to be identified by the contractor and ECO.	All construction and rehabilitation have since been completed. As per the ECO reports, no stormwater runoff or erosion issues occurred during the construction phase.
12.3	To decrease the risk of water pollution, all construction materials must be secured (e.g. only stockpiling at a pre-determined site, around which there must be a silt protection boundary) so that there is no washaway.	Complied with as per the provided ECO reports.
12.4	It is the responsibility of the contractor working inside any trench at any specific time to ensure that their works are protected from damage which may be caused through runoff of rainwater inside the trench. The use of sandbags, mulch bags or any other appropriate methods of slowing down the flow of water within a trench is required.	All construction and rehabilitation have since been completed. As per the ECO reports, no stormwater runoff or erosion issues occurred during the construction phase and the no-go demarcation doubled as a silt trap due to the bottom 200mm of the shade netting being buried into the soil to limit silt movement under the fence.
12.5	The use of grass blocks for the driveways is recommended.	The driveway is paved, but the applicant did incorporate sections of indigenous vegetation gardens on the edges of the driveway in the northern entrance.
13.	Concrete and Cement Works	
13.1	Mixing areas must be defined on-site and clearly demarcated.	No cement batching took place during the site audit as all construction and rehabilitation were completed.
13.2	All concrete must be mixed on trays / on thick plastic and not on the soil. Bunding through the use of sandbag walls around any mixing areas is recommended.	No cement batching took place during the site audit as all construction and rehabilitation were completed.

13.3	No water for the mixing of cement may be sourced from any river system / water body (dams).	No cement batching took place during the site audit as all construction and rehabilitation were completed.
13.4	No construction equipment may be cleaned near a water body (in a designated cleaning area that is well bunded only).	No cement batching took place during the site audit as all construction and rehabilitation were completed.
13.5	No mixing to be done in environmentally sensitive areas or areas where there is a high risk of cement contaminated water entering the natural area and / or non-perennial stream.	No cement batching took place during the site audit as all construction and rehabilitation were completed. According to the ECO report, cement batching took place within the permanently disturbed area which is now the swimming pool and appropriate bunding was in place near the natural vegetation.
14.	Noise Management	
14.1	During the construction phase work must comply with the normal Municipal building control requirements.	No complaints were recorded. Work took place within the designated working hours.
15.	Rehabilitation Requirements	
15.1	Rehabilitation of disturbed area as a result of construction must be rehabilitated to the satisfaction of the ECO. These areas are to be landscaped using indigenous vegetation. Additional rehabilitation measures will include, but is not limited to the following; use of sandbags, mulchbags as erosion ministration measures, seeding of bare areas with an indigenous grass seed mixture / the use of indigenous grass sods (ECO to advice) etc.	All disturbed areas have been rehabilitated to the satisfaction of the ECO. A significant amount of <i>Acacia cyclops</i> (Rooikrans) has been removed, and <i>Drosanthemum</i> species (vygies) have been successfully planted on the eastern dune slopes adjacent to the boardwalk to aid in rehabilitation and stabilization. The applicant has committed to ongoing alien vegetation clearing using manual methods only. While no heavy machinery will be used, a woodchipper may be utilised to convert dried Rooikrans into mulch, which will further support soil stabilization and rehabilitation efforts. The cut alien vegetation and mulch were used as brushwood to cover exposed areas after clearing.
15.2	Ensure that the stormwater dissipation is effectively working at all times and that there is no concentration of stormwater.	During the audit the stormwater dissipation infrastructure below the gabion structure remains in good condition.

15.3	Rehabilitation of damaged areas will include, but is not limited to the following: • All building rubble must be completely removed and disposed of at an approved landfill site; • Compacted topsoil must be raked loose; • Contaminated soil must be disposed of at an approved landfill site; • Indigenous grass seed can be sowed within required areas (as indicated by the ECO); • Indigenous planting as required for the landscaping & • Implementation of additional erosion control methods as required.	As per the final ECO report and site audit findings No construction rubble was observed during the audit. Completed and cut alien vegetation and mulch have been used as brushwood to cover exposed areas after clearing. Complied with. <i>Carpobrotus</i> cuttings were subsequently planted. All interior and exterior garden landscaping was done using indigenous plants. No additional erosion control methods were necessary. Stormwater dissipation infrastructure has been installed below the gabion structure and remains in good condition, effectively managing runoff and preventing erosion.
15.4	As depicted in the layout plan, tree planting should be incorporated as proposed. The preference is for Milkwood trees, or similar lower growing trees so as not to create a strong vertical element in contrast to the predominantly horizontal lines created by the dune and the ocean horizon line. While depicted as a line, the planting should be implemented such that they reflect a natural positioning but covering the recommended planting area.	Multiple Milkwood (<i>Sideroxylon inerme</i>) trees were planted both on and adjacent to the property. These trees were placed along the western boundary and also form part of the interior landscaping within the garden areas.
15.5	Any alien invasive species germinating must be removed immediately for the life of the development.	The applicant has committed to ongoing alien vegetation clearing using manual methods only. While no heavy machinery will be used, a woodchipper may be utilised to convert dried Rooikrans

		into mulch, which will further support soil stabilisation and rehabilitation efforts.
16.	Fencing	
16.1	Fencing is proposed around the disturbance area of the outbuilding.	The outbuilding (garage site) and associated storage structures were observed and found to be in good condition. A ClearVu security fence has been installed to restrict public access.
16.2	Fencing on the building line of the main house – north, west and east. Any fencing south of the house needs to be located on the 100m from the HWM and as per the EA may have a gate to provide access to the boardwalk and viewing deck	A ClearVu security fence has also been installed along the northwestern, western, and southern sections of the property. Towards the eastern boundary, a gabion retaining wall has been constructed, incorporating an access gate leading to the boardwalk and dune rehabilitation area.
16.3	Fencing should be contained to an effective minimum, be thru-view type with a black colour, with minimal clearing for vegetation as proposed.	The outbuilding (garage site) and associated storage structures were observed and found to be in good condition. A ClearVu security fence has been installed to restrict public access. A ClearVu security fence has also been installed along the northwestern, western, and southern sections of the property. Towards the eastern boundary, a gabion retaining wall has been constructed, incorporating an access gate leading to the boardwalk and dune rehabilitation area.
17.	Recommendation made by Specialists	
17.1	Milkwood thickets should be treated as sensitive. The entire band of vegetation should be protected and steps taken to avoid breaking the canopy open. Boundary areas should also be protected to maintain understorey microhabitats. NO access through or disturbance of the Milkwood Thicket area or the steep dune that supports the Milkwood Thicket should be permitted.	All protected Milkwood and Cheesewood trees located within and around the approved development footprint were clearly demarcated to ensure they remain undisturbed throughout the construction phase.
17.2	Tree planting should be incorporated as proposed. The preference is for Milkwood trees, or similar lower growing trees so as not to	Indigenous vegetation has ensured successful screening as well as planted milkwood trees along the western property boundary.

create a strong vertical element in contrast to the predominantly horizontal lines created by the dune and the ocean horizon line.



CONCLUSION

Based on the information obtained and a site visit conducted on the 17th of March 2025, the applicant has sufficiently complied with the conditions of the Environmental Authorisation, OSCAE permit, NFA permit, and EMPr. Furthermore, the EMP is considered adequate and effective to manage and mitigate the activities.

No specific contradictions between the EA, EMP, and associated permits 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 has been noted within Table5.

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



Access to the site along the MR6817/Ottosrust.



Outside landscaping of natural vegetation on the western boundary of the property, the majority of the site contains Rooikrans.



Outside landscaping of natural vegetation on the western boundary of the property.



Milkwood trees were planted on the western boundary of the property.



The southern boundary of the property, where one of the sewage conservancy tanks is located.



Entrance to the property towards the northeast.



Natural vegetation adjacent to the outbuilding which is utilised as a storage area.



Boundary fence of the outbuilding across from the property.



Outside access to the outbuilding (garage site).



Vegetation corridor north of the outbuilding (garage site).



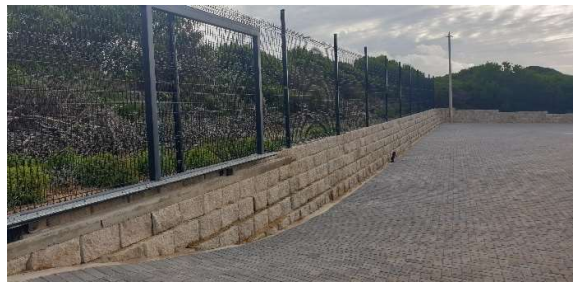
Outside landscaping of natural vegetation on the western boundary of the property. Milkwood trees have been planted for screening and conservation efforts.



Outside landscaping of natural vegetation on the western boundary of the property. Milkwood trees have been planted for screening and conservation efforts.



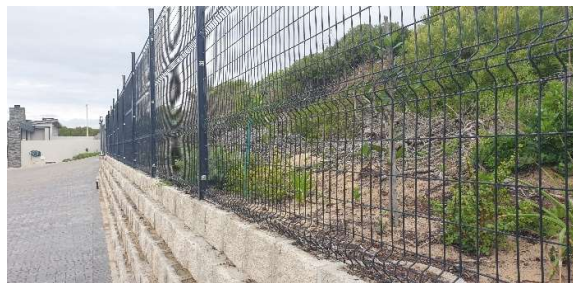
Outside landscaping of natural vegetation on the western boundary of the property. Milkwood trees have been planted for screening and conservation efforts.



The western boundary of the property. Milkwood trees have been planted for screening and conservation efforts.



Condition of landscaping inside the premises.



The western boundary of the property. Milkwood trees have been planted for conservation efforts.



Milkwood tree planted inside the premises.



Condition of landscaping inside the premises.



Condition of the natural vegetation corridor towards the north of the site.



Condition of the natural vegetation corridor towards the north of the site.



Condition of the natural vegetation corridor towards the north of the site where the stormwater outlet is located.



Eastern boundary of the property.



Stormwater installation towards the east of the site.



Stormwater installation towards the east of the site.



Gabion retention wall on the eastern property boundary.



Rehabilitation of dune slopes towards the east with vygies.



Rehabilitation of dune slopes towards the east with vygies.



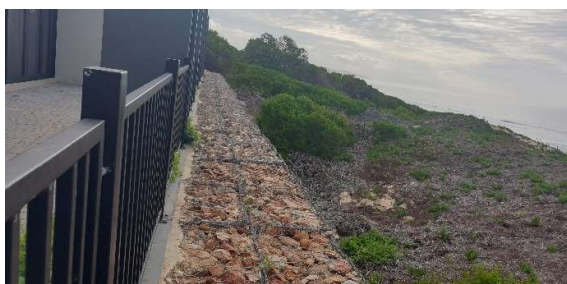
Rehabilitation of dune slopes towards the east with vygies.



Cleared Rooikrans towards the east.



Stormwater outlet on the northern section of the property.



Gabion retention wall and rehabilitated dunes.



Broadwalk towards the south east.



Condition of the broadwalk.



Access gate to the broadwalk.



Landscaping with indigenous vegetation.



Southeastern section of the property.



Gabion retention wall towards the south end of the property.



Condition of the gabion retention wall on the eastern boundary of the property.



Surveyor peg still in place.



Condition of the broadwalk. Cleared Rooikrans being used for firewood.



Condition of the broadwalk. Cleared Rooikrans being used for firewood.



Condition of the broadwalk. Cleared Rooikrans being used for firewood.



Condition of the broadwalk. Cleared Rooikrans being used for firewood.



Washing station for sand and other organic debris at the broadwalk. Cleared Rooikrans being used for firewood.



Cleared Rooikrans towards the east of the property on the sandy dunes.



Rehabilitation of the eastern section of the property.



Condition of the remainder of the property and natural vegetation, majority alienated with Rooikrans.



Condition of rehabilitated dunes towards the east of the site.



Condition of the single residence towards the north.



Condition of the single residence towards the west.