ATT: NAADIYA WOOKEY

THE HIGH-PERFORMANCE SPORT CENTRE, SPORTS ACADEMY AND ASSOCIATED INFRASTRUCTURE ON PORTION 28 (A PORTION OF PORTION 15) AND PORTION 63 (A PORTION OF PORTION 25) OF FARM GUSTROUW NO. 918, STRAND.

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/A3/57/2031/23
NEAS REF. NO. WCP/EIA/0001317/2023

Prepared for:
The Director
Rhinos Asset Holdings (Pty) Ltd.
Mr. D. Nellmapius
290 Anthony Street
Newlands
0049
Tel: (021) 204 7942
E-mail: derek@rhinosacademy.com

Contact Person:
Mynhardt Enslin
083 603 0770
mynhardt@pepperpod.com

Prepared by:
Kapp Environmental Consultants (Pty) Ltd
P.O.Box 121
Mossel Bay
6500
Cell: 082 675 5233
E-Mail: renier@kappec.co.za

KAPP ENVIRONMENTAL CONSULTANTS

KAPPEC

27 May 2025

DETAILS OF THIS REPORT

Status of this Report	**Final Regulation 34 External Compliance Audit Report**
Date Submitted	May 27, 2025
Public Review Period	Not Applicable
Report Title	The High-Performance Sport Centre, Sports Academy and Associated Infrastructure on Portion 28 (a Portion of Portion 15) and Portion 63 (a Portion of Portion 25) of Farm Gustrouw No. 918, Strand.
Applicant	**The Director** **Rhinos Asset Holdings (Pty) Ltd.** Mr. D. Nellmapius 290 Anthony Street Newlands 0049 Tel: (021) 204 7942 E-mail: derek@rhinosacademy.com **Contact Person:** Mynhardt Enslin 083 603 0770 mynhardt@pepperpod.com
Prepared by	**Renier Kapp** **Kapp Environmental Consultants (Pty) Ltd** P.O.Box 121 Mossel Bay 6500 Cell: 082 675 5233 E-Mail: renier@kappec.co.za
	KAPP ENVIRONMENTAL CONSULTANTS

DISCLAIMER

This report has been prepared for the Director of Rhinos Asset Holdings (Pty) Ltd., represented by Mr. D. Nellmapius and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC). The contact person listed for further communication is Mr. Mynhardt Enslin.

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.

LETTER OF UNDERTAKING AND STATEMENT OF INDEPENDENCE

I Renier Kapp, as the appointed independent Environmental Assessment Practitioner (EAP) 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

27 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

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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated 24 April 2025, by the Director of Rhinos Asset Holdings (Pty) Ltd., represented by Mr. D. Nellmapius (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 13 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to Rhinos Asset Holdings (Pty) Ltd., on March 8, 2024 (DEA&DP EIA Ref: 16/3/3/1/A3/57/2031/23) in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended).

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 Authorisation and the EMPr. 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 summarised 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 (8 May 2025)
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report (27 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 (N/A)	A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.
GREEN (4)	An item is marked green to indicate complete compliance in line with the EMP.
YELLOW (3)	An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.

ORANGE (2)	An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.
RED (1)	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 construction of a High-Performance Sports Centre (HPSC) and associated infrastructure on Portion 28 (a portion of Portion 15) and Portion 63 (a portion of Portion 25) of Farm Gustrouw No. 918, located in Strand, within the City of Cape Town, Stellenbosch Division, Western Cape. The development aims to establish a state-of-the-art facility catering to elite sports training, accommodation, medical support, and auxiliary services.

The subject property is situated adjacent to the N2 highway, bounded by Mondeor Road (south), Dinsley Walk Road (west and north), and Monkey Town (east). The site forms part of a mixed-use intensification area and tourism development node, as identified in the Helderberg District Spatial Development Framework (DSDF, 2023).

Development Components

Core Facilities

- High-Performance Centre: Designed to accommodate international sports teams, the centre will include an indoor running track, gym, refreshment areas, reception, boardroom, and offices.
- Sport Medical Centre: Adjacent to the high-performance centre, with consultation rooms, physiotherapy, biokinetics, medical testing, rehabilitation, and support areas.
- Clubhouse: Located north of Field A, including a cafeteria, kitchen, shop, and coffee area.

Athlete Accommodation

- Comprised of prefabricated “living pods” arranged into two clusters:
- Four clusters along the northern boundary
- Three clusters along the eastern boundary
- Each cluster consists of eight double-storey pods arranged around a central courtyard.
- Each pod accommodates up to 5 individuals, with a maximum total capacity of 280 athletes.

Training Fields

- Field A (grassed) – centrally located between Fields B and C.
- Field B (artificial turf) – northeast of Field A.
- Field C (artificial turf) – southwest of Field A.
- All fields will be equipped with 15m high floodlights.
- Two smaller grassed fields, located on Portion 63, will support additional training activities.

Supporting Infrastructure

- Administrative and Operational Facilities
- Skills Development Workshop

- Access Control Building: Includes laundry, tuck shop, offices, ablutions, and storage.
- Internal Roads: Roads exceeding 4m in width will provide internal circulation.

Parking and Renewable Energy

Located primarily on Portion 63 and designed to accommodate both vehicles and buses.
Includes shaded parking with PV solar panels, covering 1,786m², generating 0.371 MWp of electricity.

Services and Utilities

Wastewater Management

- Due to constraints at the Macassar Wastewater Treatment Works, an on-site package plant (120kl/day) will be installed.
- Treated effluent will be directed to an irrigation pond (178m³ capacity) for landscape use, with excess undergoing further reed bed polishing before discharge into a stormwater attenuation pond.

Stormwater Management

- An on-site attenuation facility (2,145m³) will manage site runoff, with overflow directed to a regional attenuation pond (4,000m³) on Portion 206.
- Infrastructure includes 600mm pipelines connecting to the 900mm regional bulk stormwater line.

Water Supply

- Potable water will be provided by the local authority via two potential pipeline routes:
- Preferred: 160mm pipe, 600m from Sir Lowry's Pass Road.
- Alternative: Via Onverwacht Road, connecting to the 500mm water main.
- Estimated daily water demand: 98,488l, peaking at 393,952l/day.

Electricity Supply

- Electricity will be provided by Eskom via the Waterkloof 1 network (700 kVA capacity).

Access and Traffic

- Main access via Mondeor Road, with a secondary access 35m away for workshop services.
- Emergency access via Dinsley Walk Road.
- Internal layout includes 172 parking bays and 7 bus bays.
- Upgrades to the T2/Broadlands Road intersection and Mondeor Road surfacing will be implemented as per the Traffic Impact Assessment.

Environmental and Noise Mitigation

- A 5m high, 213m long pre-cast stepped barrier wall will be erected along the eastern boundary (adjacent to Monkey Town) to mitigate visual and noise impacts, constructed prior to earthworks for Field C.
- Additional noise mitigation includes:
- Appointment of a Primate Specialist to monitor animal behaviour.
- Annual environmental noise surveys.
- Reed bed system for effluent polishing.
- No on-site construction will exceed SANS 10103:2008 daytime noise limits, aside from temporary impact on receptors at Monkey Town.

Development Footprint

The total proposed development footprint spans approximately 8 hectares across Portions 28 and 63 of Farm Gustrouw No. 918.

LISTED ACTIVITIES

Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended.

Activity Number: 9

Activity Description:

The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water—

(i) with an internal diameter of 0,36 metres or more; or

(ii) with a peak throughput of 120 litres per second or more;

excluding where—

(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or

(b) where such development will occur within an urban area.

The proposed development includes the development of either a 200mm diameter or 500mm diameter water supply pipeline for the bulk transportation of water from either the proposed regional water main in Sir Lowry's Pass Road or the existing water main, approximately 1100 meters west of the proposed site, respectively. The proposed pipeline route is located outside an urban area. Additionally, the proposed development will result in the development of a 900mm diameter stormwater pipeline approximately 1200 meters in length for the bulk transportation of stormwater from the proposed site to the proposed regional stormwater attenuation pond.

Activity Number: 28

Activity Description:

Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:

(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or

(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;

excluding where such land has already been developed for residential, mixed, retail,commercial, industrial or institutional purposes.

The proposed development is proposed on land currently used for equestrian purposes, outside an urban area, on a site greater than 1 hectare in extent.

Environmental Impact Assessment Regulations Listing Notice 3 of 2014, as amended.

Activity Number: 4

Activity Description:

The development of a road wider than 4 metres with a reserve less than 13,5 metres.

i. Western Cape

i. Areas zoned for use as public open space or equivalent zoning;

ii. Areas outside urban areas;

(aa) Areas containing indigenous vegetation;

(bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or

iii. Inside urban areas:

(aa) Areas zoned for conservation use;

or

(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.

The proposed development will result in the development of internal roads ranging between 4 – 7 meters in width on areas containing indigenous vegetation outside an urban area.

Activity Number: 6

Activity Description:

The development of resorts, lodges, hotels, tourism of hospitality facilities that sleeps 15 people or more.

i. Western Cape

i. Inside a protected area identified in terms of NEMPAA;

ii. Outside urban areas;

(aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or

(bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve;

- excluding the conversion of existing buildings where the development footprint will not be increased.

The proposed development will result in the development of accommodation facilities that may sleep 15 or more people in approximately 2.5km from a World Heritage Site (i.e. Cape Floral Region Protected Areas proclaimed 30 January 2009).

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

In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person with the relevant environmental auditing expertise and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended).

13.1. The holder must undertake an environmental audit within three (3) months of the commencement of development activities and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit.

13.2. A second Environmental Audit Report must be submitted to the Competent Authority within one (1) year of commencement of development activities and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit.

13.3. Environmental Audit Reports must be submitted to the Competent Authority every two years for the duration of the development phase and submit the Environmental Audit Reports to the Competent Authority within one (1) month after the completion of the environmental audit.

13.4. A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of commencement of the operational phase and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit.

13.5. The holder must, within seven (7) days of the submission of the Environmental Audit Reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the Environmental Audit Report available to any I&APs upon request.

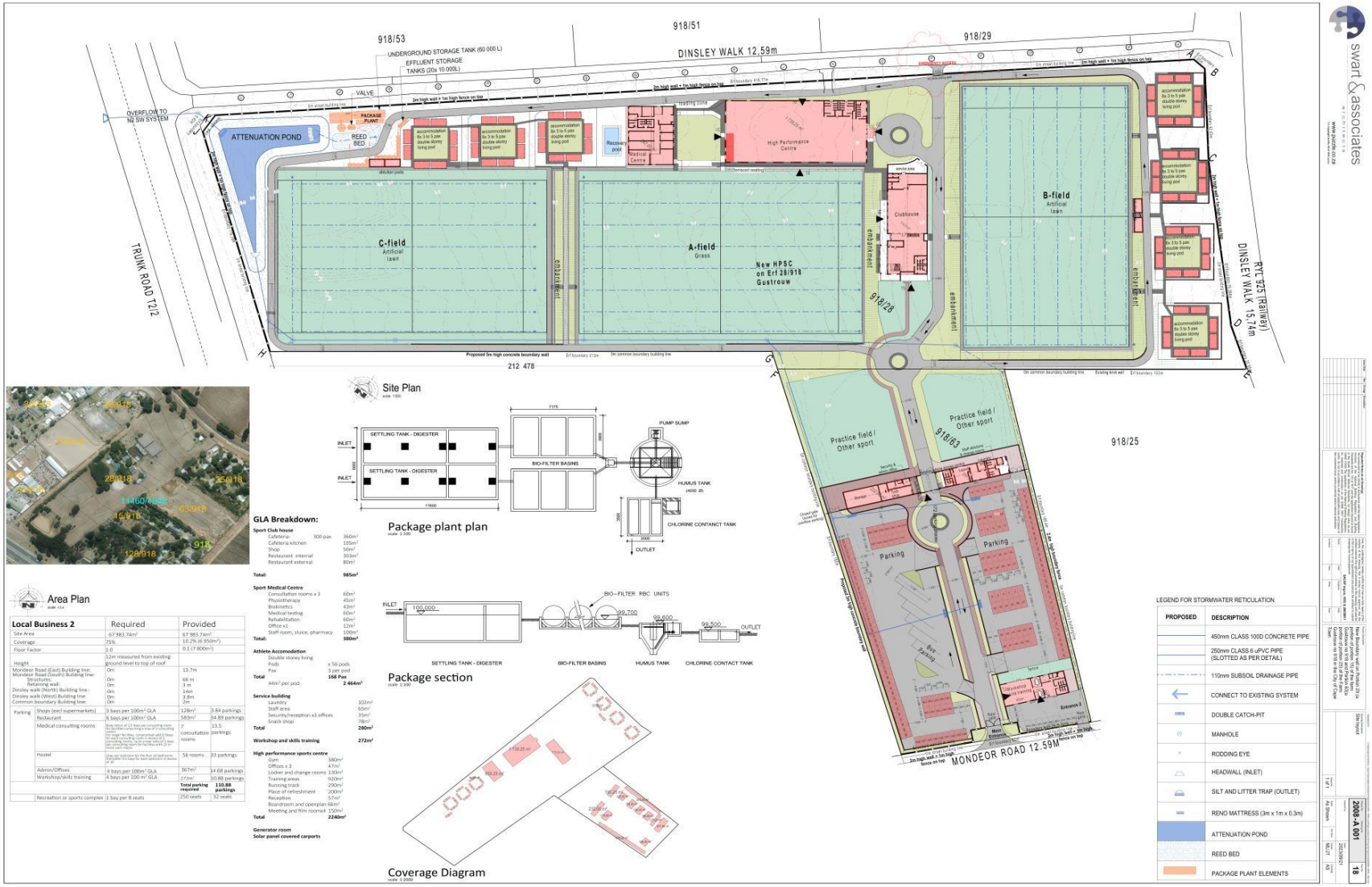


FIGURE 1: SITE DEVELOPMENT PLAN (SWART & ASSOCIATES, 2023)

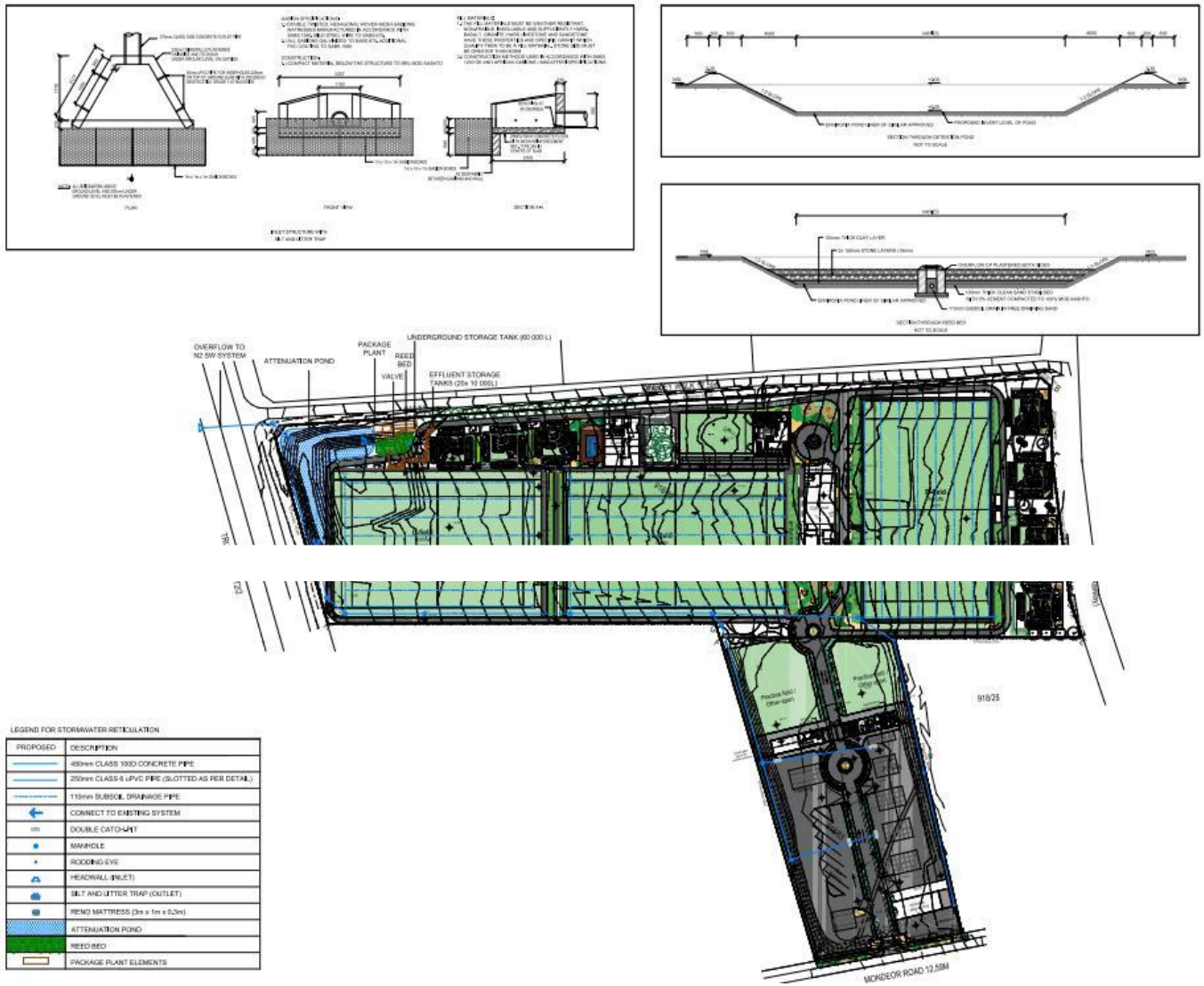


FIGURE 2: STORMWATER DESIGN (UDS, 2023)

FIGURE 3: LANDSCAPING PLAN (VIRIDIAN, 2023)

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Alternative described in Section B above and in the BAR dated 01 November 2023 on the site as described in Section C above.	Noted. All listed activities and the preferred alternative as set forth in the EA in being implemented accordingly.
2.	The holder must commence with, and conclude, the listed activities within the stipulated validity period, which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority. This Environmental Authorisation is granted for – (a) A period of five (**5**) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and (b) A period of ten (**10**) years, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities for the construction phase, must be concluded.	The EA was issued on the 8th of March 2024. DEA&DP was notified of the intended commencement of work on July 1, 2024. Thus, within the 5-year commencement period. The activities should be concluded in 2034. The ECO subsequently informed DEA&DP that construction had already commenced within the month March without notifying the ECO.
3.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee, or any person rendering a service to the holder.	Noted, the holder remains responsible for the actions undertaken by anyone on site.

4.	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.
5.	A minimum of **seven (7)** calendar days' notice, in writing, must be given to the Competent Authority before commencement of the development activity. 5.1. The notice must make clear reference to the site details and EIA Reference number given above. 5.2. The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7, 10, and 21.1.	A notification of commencement was sent to DEA&DP on the 1st of July 2024, making clear reference to the site details, EIA Reference number, and proof of compliance. Please note that the following was recorded on the Notification of Commencement Letter: ***Condition 6:*** *Please refer to all the I&AP notification proof attached to the email.* ***Condition 7:*** *The I&APs were notified of the EA on the 11th of March 2024, so commencement is outside the 20-day period.* However, it was noted that construction activities began in March without notifying the ECO. As a result, this condition is considered non-compliant. ***Condition 10:*** *Guillaume Nel Environmental Consultants*

		(GNEC) has been appointed as the Environmental Control Officer (ECO) to conduct fortnightly audits on environmental compliance and will subsequently submit a monthly report to your Department. ***Condition 21.1:*** *No appointment of a suitably qualified person prior to the commencement of development to record and monitor the behaviour and physiology of the chimpanzees will be needed, as the Monkey World has been closed and the chimpanzees have been relocated.* The auditor suggests a finding of partial compliance, as the ECO was not informed of the actual commencement date of construction and therefore did not intentionally neglect their responsibilities, but was unable to fulfil their duties from the outset due to a lack of proper notification.
6.	The holder must in writing, within **fourteen (14)** calendar days of the date of this decision– 6.1. Notify all registered Interested and Affected Parties ("I&APs") of – 6.1.1. the outcome of the application; 6.1.2. the reasons for the decision as included in Annexure 5; 6.1.3. the date of the decision; and 6.1.4. the date when the decision was issued. 6.2. 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	The I&AP Notification Letter was sent on March 11, 2024, three days after the Environmental Authorisation (EA) was granted. All required information was included in accordance with the stipulated conditions. No appeals have been lodged against the EA to the auditor's knowledge.

	Appeal Regulations, 2014 (as amended) detailed in Section G below; 6.3. Draw the attention of all registered I&APs to the manner in which they may access the decision; and 6.4. Provide the registered I&APs with: 6.4.1. The name of the holder (entity) of this Environmental Authorisation; 6.4.2. The name of the responsible person for this Environmental Authorisation; 6.4.3. The postal address of the holder; 6.4.4. The telephonic and facsimile details of the holder; 6.4.5. The e-mail address, if any, of the holder; and 6.4.6. The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).	
7.	The listed activities, including site preparation, must not commence within **twenty (20)** calendar days from the date the holder notifies the registered I&APs of this decision. 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.	The I&APs were notified on 11 March 2024, and the letter of commencement was issued on 1 July 2024. However, it was noted that construction activities began in March without notifying the ECO. As a result, this condition is considered non-compliant. However, no appeals were lodged against the EA.
8.	The Environmental Management Programme ("EMPr") (compiled by Guillaume Nel Environmental Consultants and dated 01 November 2023) submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.	Compliant. The approved EMPr is currently being implemented on-site. For a detailed assessment of the EMPr compliance, please refer to Table 4.

9.	The EMPr must be included in all relevant contract documentation for the applicable phases of implementation.	Compliant. Since the Holder and the Developer are the same entity, no separate contractual documentation exists. However, the Developer has signed a formal letter confirming that the EMPr will be implemented on-site.
10.	The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before the commencement of any land clearing or development activities to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.	Guillaume Nel Environmental Consultants (GNEC) was appointed as the ECO in June 2024, with the responsibility of conducting biweekly environmental compliance audits and submitting a consolidated monthly report to your Department. However, the contractor confirmed that construction activities commenced in March 2024, prior to the ECO's appointment. As such, this condition is considered non-compliant.
11.	A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the site of the authorised activities during the development activities thereafter it must be kept at the office of the holder and must be made available to any authorised person on request.	Upon arrival, auditors were required to sign in at a temporary access building, where induction procedures are also carried out for workers and visitors. The site office is well-organised and houses an environmental file containing the Environmental Authorisation (EA), Environmental Management Programme (EMPr), ECO reports, induction records, waste disposal slips, site layout plans, water meter quotations and analysis records, and relevant contract documentation.
12.	Access to the site referred to in Section C above 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, and the environmental file was presented to the Competent Authority.
13.	In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to	Partial Compliance

	determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person with the relevant environmental auditing expertise and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). 13.1. The holder must undertake an environmental audit within three (3) months of the commencement of development activities and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit. 13.2. A second Environmental Audit Report must be submitted to the Competent Authority within one (1) year of commencement of development activities and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit. 13.3. Environmental Audit Reports must be submitted to the Competent Authority every two years for the duration of the development phase and submit the Environmental Audit Reports to the Competent Authority within one (1) month after the completion of the environmental audit. 13.4. A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of commencement of the operational phase and submit an Environmental Audit Report to	According to the contractor, development activities commenced in March 2024, shortly after the Environmental Authorisation (EA) was issued. In terms of Condition 13.1 of the EA, the first external environmental audit should have been conducted by June 2024, with the report submitted within one month thereafter. However, as the Environmental Control Officer (ECO) was only appointed in June 2024, this requirement was not met within the specified timeframe. To address this non-compliance, an external audit should now be conducted as a matter of urgency. In accordance with Condition 13.2, a second Environmental Audit Report must still be submitted before March 2025. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed on 24 April 2025 by the Director of Rhinos Asset Holdings (Pty) Ltd., represented by Mr. D. Nellmapius (the Applicant), as the independent Environmental Assessment Practitioners to conduct the external compliance audit. However, this appointment occurred outside the required audit periods stipulated in the EA.

	the Competent Authority within one (1) month after the completion of the environmental audit. 13.5. The holder must, within seven (7) days of the submission of the Environmental Audit Reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the Environmental Audit Report available to any I&APs upon request.	

ENVIRONMENTAL AUTHORISATION SPECIAL CONDITIONS AND COMPLIANCE

TABLE 3: SPECIAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
14.	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate.	Compliant all refuse is delivered to the Gordons Bay or Vissershok Dump. Please refer to Appendix H for the waste disposal slips provided by the ECO. Also note that the environmental file available at the site office contains all the waste disposal slips obtained thus far.
15.	Should any heritage resources be discovered during the execution of the activities above, all works must be stopped immediately and the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape must be notified without delay. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil bones and fossil shells); coins; indigenous and/ or colonial ceramics; any articles of value or antiquity; 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. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	No heritage remains were exposed during excavations as per the ECO reports provided, thus far.
16.	The recommendations of the supplementary Heritage Impact	Noted. The Holder must comply with the Heritage

	Assessment (compiled by Cindy Postlethwayt and dated September 2023) and as supported by Heritage Western Cape (dated 25 October 2023) must be implemented during the construction phase.	recommendations regarding the fencing, lighting, and landscaping. The areas adjacent to the entrance have thus far been landscaped by the contractor and site agent.
17.	Surface, storm, or groundwater must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.	The requirement to prevent pollution of surface, storm, or groundwater due to activities on site is noted. As per the groundwater impact assessment, boreholes are being installed and regularly monitored, along with regular water quality analysis, to ensure compliance with the applicable water-related legislation.
18.	The following groundwater mitigation measures must be implemented: 18.1. The recommendations of the Groundwater Impact Assessment (compiled by GEOSS (South Africa) (Pty) Ltd and dated 30 September 2022) (as included and supported in the Freshwater Ecological Verification (compiled by FEN Consulting and dated June 2020 and updated July 2023)) and as included in the EMPr must be implemented during all phases of the proposed development. This must include, *inter alia,* the following: 18.1.1. Groundwater monitoring boreholes must be installed during the development phase. 18.1.2. The location, number of boreholes and frequency of monitoring must be determined by a suitably qualified person prior to the installation of boreholes. 18.2. The recommendations of the Addendum to the Groundwater Impact Assessment (compiled by GEOSS (South Africa) (Pty) Ltd and dated 17 July 2023) must be implemented during the development phase. This includes, *inter alia, t*he installation of an	As per the April 2025 ECO report and site audit. 18.1.1) The Holder is in the process of installing groundwater monitoring systems and has received quotes for the required installation. 18.1.2) Boreholes have been successfully placed on site, with their locations shared with the ECO. 18.2) The Holder is currently reviewing the installation of an additional monitoring well/borehole, which should be placed downgradient of Portion 63 (a portion of Portion 25) and in the south-western corner of the property. The Holder has confirmed

	additional monitoring well/borehole, which must be placed downgradient of Portion 63 (a portion of Portion 25) and in the south-western corner of the property.	that quotes for this installation have been received. During the site audit, boreholes were being installed towards the southeastern corner.
19.	The recommended mitigation measures provided by the Visual Impact Assessment (compiled by Filia Visual and dated June 2021 (revision 1)) and the Visual Impact Assessment Supplementary Report (compiled by Filia Visual and dated 25 September 2023) and as included in the EMPr must be implemented during all phases of the proposed development.	Noted. The Holder will assume responsibility for this matter. For a detailed assessment of visual compliance within the EMPr, please refer to Table 4.
20.	Noise monitoring must be conducted by a suitably qualified person during the construction and operational phases of the development in accordance with the recommendations of the Noise Impact Assessment (compiled by Safetech and dated 10 July 2023).	Noise monitoring has not been conducted on site, as the chimpanzees previously housed at MonkeyTown have been relocated, which was the primary reason for the noise surveys. Therefore, this requirement is no longer applicable.
21.	The recommended mitigation measures provided by the Primatological Assessment (compiled by African Primate Initiative for Ecology and Speciation – Dr C. Andrews) and as included in the EMPr, must be implemented during all phases of the proposed development. This must include, *inter alia,* the following: 21.1. The appointment of a suitably qualified person prior to the commencement of development activities to record and monitor the behaviour and physiology of the chimpanzees at least one week prior to the commencement of development activities and during the development phase (where applicable). 21.2. The implementation of the construction methodology (compiled by Swart and Associates Architects dated 18 October 2023) must be adhered to.	The appointment of a suitably qualified individual to record and monitor the behaviour and physiology of the chimpanzees prior to the commencement of development is no longer required, as Monkey World has been closed and the chimpanzees have been relocated.
22.	Dust suppression measures must be used to mitigate dust during the construction phase. No potable water must be used to mitigate dust	Compliant. Dust suppression measures are actively in place on site, utilising stored borehole water and making use of the on-

	nuisance. Alternative dust suppression methods (such as shade netting screens and/ or straw stabilisation, etc.) must be implemented instead.	site water filling station. Recent rainfall has reduced the need for frequent dust control.
23.	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	As per the ECO reports provided and communication with the site agent, the holder is compliant. Employment opportunities have been provided to the local community.

EA Compliance Rating	**90.63%**

SITE AUDIT FINDINGS

An external environmental audit was conducted on Thursday, 8 May 2025. During the audit, it was observed that the contractor is actively engaged in site development activities, including trenching for stormwater infrastructure and borehole drilling at the southeastern corner of the site. Currently, two boreholes are being used alternately to supply water for irrigation and dust suppression purposes. The site is also equipped with a reservoir and four JoJo tanks, which are used to store water and ensure availability as required for operational activities.

Field A and Field B have both undergone seeding and reseeding, with the areas being levelled using builder's sand. The designated rehabilitation zones within these fields have been stabilised and levelled using clay excavated from the site. Field C has been surfaced with cement as preparation for the installation of a sand-based astro turf field, which is positioned adjacent to Monkey Town's entertainment centre (noting that this facility is now used exclusively as a recreational space with a slip-and-slide and no longer houses chimpanzees).

Upon arrival, auditors were required to sign in at a temporary access building, where induction procedures are also carried out for workers and visitors. The site office is well-organised and houses an environmental file containing the Environmental Authorisation (EA), Environmental Management Programme (EMPr), ECO reports, induction records, waste disposal slips, site layout plans, water meter quotations and analysis records, and relevant contract documentation.

Temporary solar panels have been installed at ground level and are currently supplying the electricity necessary for operations on site. These panels will be repositioned onto the parking structure roof once roadworks and parking infrastructure have been completed, as per the approved site plan. Additionally, an inverter room has been set up within a lockable container, ensuring a secure and stable power supply management.

The boundary walls surrounding the development have been completed, and all existing trees on the site remain unharmed. Importantly, the Outeniqua yellowwood trees located within Monkey Town's perimeter are not affected by the construction activities, as they fall outside the designated development footprint. A fire protection plan has been developed, and fire safety equipment is available at the site office for use in case of emergency.

Water meters have been quoted on, and water quality analysis is being conducted every three months in line with environmental compliance requirements. A fully equipped contractor's camp has been established, which includes designated, screened smoking and eating areas, as well as a kitchen housed within a container. The site camp/ contractor's yard is neat and well-maintained, with a drip tray positioned beneath the fuel bowser and an impermeable surface installed where machinery maintenance occurs, in the future parking area.

No litter was observed during the audit, and the general condition of the site is commendably clean and orderly. According to the site agent, rehabilitation of disturbed areas will begin as soon as the

bulk stormwater infrastructure has been completed. In the interim, a temporary stormwater management structure has been installed along the northwestern boundary of the site, adjacent to Dinsley Walk and the emergency exit. This structure incorporates rock-filled channels designed to control and dissipate runoff.

Lastly, concrete retaining blocks have been installed around Field B to stabilise the landscape and support slope integrity, further demonstrating the contractor's adherence to environmental and engineering best practices.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 4: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	**Visual**	
1.1	**The Retention and Replacement of Trees** The existing tree-belts, windbreaks and mature tree specimens must be retained as indicated on the Tree Management Plan, and their retention made a condition of approval.	All natural trees present on site have been retained in accordance with the Tree Management Plan. No disturbance to existing tree-belts, windbreaks, or mature specimens has occurred. Importantly, the Outeniqua yellowwood trees located within Monkey Town's perimeter are not affected by the construction activities, as they fall outside the designated development footprint.
1.2	The integrity of natural features which form part of a neighbourhood's identity should be safeguarded (e.g., significant vegetation and trees). All trees that form part of the belt of trees that provide screening and contribute to the sense of place, and do not fall under proposed building footprints, should be retained.	All natural trees present on site have been retained in accordance with the Tree Management Plan. No disturbance to existing tree belts, windbreaks, or mature specimens has occurred. During the site audit, a palm tree was anchored and the southern slopes landscaped. The contractors will also be landscaping the embankments of Field A and B with trees to ensure a sense of place.
1.3	Tree protection guidelines must be prepared for this project at the building plan level, to be implemented during the construction phase, to ensure that construction activities do not result in the loss of trees to be retained.	As per the Tree Management Plan and all trees have been retained, and no disturbance to the mature specimens was noted during the site audit.
1.4	Specifications for the replacement of trees marked for retention must form part of the project documentation to be approved at building plan level. In the event that a tree marked for retention is removed, is damaged or dies it must be replaced with an	Noted, during the site audit, all natural trees present on the site have been retained in accordance with the Tree Management Plan. No disturbance to existing tree belts, windbreaks, or mature specimens was noted. During the site audit, the contractors

	appropriate specimen during the Construction or Operational phase of the project.	mentioned that the embankments of Field A and B will be landscaped with trees to ensure a sense of place.
1.5	Shade cloth must be utilised to conceal and minimise the visual impact of contractor camps, lay-down and storage areas.	A boundary wall has been constructed around the property, providing effective visual screening from the public. Shade cloth has been used to screen the designated eating area, ensuring a tidy and contained space. A secure storage container is available on site for the storage of equipment and loose materials. Although laydown areas are in continuous use, additional screening is currently considered impractical due to ongoing activity. The contractor's yard and site camp have been cordoned off, but not fully screened. However, as these areas are only visible to site personnel and are concealed from public view by the boundary wall, there is no significant visual impact on the surrounding environment.
1.6	• Boundary walling, fencing and gateways should be in keeping generally with a visually neutral architectural character, and should be visually permeable. • Where security fencing is required, it should be screened with trees or hedging. • Gateways and gateway structures should be set back from the boundary by no less than 6m and should be visually simple in design, if possible.	The boundary wall erected around the property is consistent with a visually neutral architectural character, providing a clean and unobtrusive appearance. While the wall is not fully permeable, its design complements the surrounding landscape and serves both security and visual containment purposes. Although screening with trees or hedging around the wall is not currently in place, the preservation of existing natural vegetation on site, and landscaping measures helps to soften the overall visual impact. Gateway placement and design will comply with practical access needs when it is constructed.
2.	**Site Demarcation and Development**	
2.1	The EO and ECO must be on site in order to make sure the correct areas are fully demarcated.	The site is effectively screened and demarcated by the vibracrete boundary wall that has been constructed around the perimeter.
2.2	Where practically possible, site screening methods should be	Dust suppression measures are actively in place on site, utilising

	employed to minimise the potential dust nuisance created by earth-moving equipment, particularly during site preparation processes.	stored borehole water and making use of the on-site water filling station. Recent rainfall has reduced the need for frequent dust control.
2.3	Such dust screening measures should be installed on the perimeter of the site and at areas of high dust generation. The materials used should be capable of reducing the quantity of dust being blown off-site to below nuisance levels.	Dust suppression measures are actively in place on site, utilising stored borehole water and making use of the on-site water filling station. Recent rainfall has reduced the need for frequent dust control.
2.4	Implement monthly groundwater quality monitoring during the construction phase.	As per the site agent, the Holder is in the process of installing groundwater monitoring meters and has received quotes for the required installation. This will allow monthly oversight. Water quality analysis is currently being conducted every three months.
3. 3.1	**Stockpiles** All stockpiled material must be easily accessible on site without any environmental damage to the surrounding properties.	All stockpiled material is currently stored within designated temporary laydown areas situated in the planned parking zone, the workshop area, and the section between Field A and Field B. No evidence of environmental damage was observed during the site audit.
3.2	All temporarily stockpiled material must be stockpiled in such a way that the spread of materials is minimised. In the case of strong wind and/or rain, all stockpiled material must be covered with a tarpaulin in order to prevent erosion. All exposed soils must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles.	Currently, the stockpiled material on site is not adequately secured to withstand excessive wind or rain. The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Due to this ongoing usage, it is impractical to cover these large, frequently accessed stockpiles with tarpaulins or install geotextile protection as required. Although the laydown areas are located within designated zones away from sensitive environmental features, the current

		management approach does not fully comply with the specified condition regarding erosion control and protection against environmental degradation during adverse weather. The auditor suggests that the contractor designate smaller, more contained stockpile areas where possible. Cover less frequently accessed stockpiles with tarpaulins or geotextile when not in immediate use. Schedule and record regular checks before forecasted rain or high winds to secure materials and prevent runoff.
3.3	The stockpiles may only be placed within the demarcated areas, outside of delineated watercourses, the location of which must be approved by the RE, EO or ECO.	Complied with, all stockpiled material is currently stored within designated temporary laydown areas situated in the planned parking zone, the workshop area, and the section between Field A and Field B.
3.4	Stormwater runoff from the stockpile sites and other related areas must be directed into the stormwater system	Stormwater runoff from the stockpile areas and surrounding zones is being managed in alignment with the site's phased infrastructure development. Currently, the bulk stormwater pipeline is under installation, which will ultimately connect all runoff points to the formal stormwater system. In the interim, temporary stormwater control measures have been implemented, including the placement of large rocks along the northwestern boundary of the site to slow down and break up runoff, thereby reducing erosion and surface flow impact. Additionally, small stormwater diversion channels have been constructed along the northwestern embankment of Field B, which help redirect stormwater away from sensitive areas and reduce pooling.

3.5	Stockpiles are to be stabilised if signs of erosion are visible.	No sign of erosion was observed during the site audit.
3.6	The contractor/ECO will take cognisance with regard to weather forecasts and prepare/maintain the construction area. All relevant stockpiles, plant and construction equipment will be removed from the construction area prior to possible flooding events.	Noted, no flooding events have been recorded to date.
3.7	No building materials (sand, aggregate, topsoil, etc.) will be stockpiled in or near any watercourse(s).	No evidence of building material stockpiles has been placed near water sources.
3.8	Soils from different horizons must be stockpiled such that topsoil stockpiles do not get contaminated by sub-soil material.	Complied with. During the site audit topsoil stockpiles, mulch and G5 material stockpiles were placed separately within the designated laydown areas.
3.9	Topsoil stockpiles must be monitored for invasive exotic vegetation growth. Contractors must remediate as and when required in consultation with the EO, RE and ECO.	Small amounts of invasive vegetation were noted during the site audit, and the site agent was made aware of it and will remove it in due course.
3.10	All exposed soils must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles.	Currently, the stockpiled material on site is not adequately secured to withstand excessive wind or rain. The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Due to this ongoing usage, it is impractical to cover these large, frequently accessed stockpiles with tarpaulins or install geotextile protection as required. Although the laydown areas are located within designated zones away from sensitive environmental features, the current management approach does not fully comply with the specified condition regarding erosion control and protection against environmental degradation during adverse weather.

		The auditor suggests that the contractor designate smaller, more contained stockpile areas where possible. Cover less frequently accessed stockpiles with tarpaulins or geotextile when not in immediate use. Schedule and record regular checks before forecasted rain or high winds to secure materials and prevent runoff.
3.11	Stockpiles must not be higher than 2m to avoid compaction thereby maintaining the soil integrity and chemical composition.	The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Although the stockpiles are continuously used, the auditor suggests that the contractor designate smaller, more contained stockpile areas where possible.
4. 4.1	**Cement** It is suggested that ready-mix cement be used as far as possible to minimize the possible impact on the surrounding environment.	Noted, no active cement batching occurred during the site audit.
4.2	No contaminated water-runoff from any in-situ concrete works may be allowed. Waste concrete may not be dumped in or surrounding the watercourses and must be taken off site.	Noted, no active cement batching occurred during the site audit.
4.3	Concrete spilled outside of the demarcated area must be promptly removed and taken to a suitably licensed waste disposal facility.	Noted, no active cement batching occurred during the site audit.
4.4	The mixing of concrete shall only be done at selected sites on mortar boards or similar structures to contain run-off into natural vegetation, soils and streams.	Noted, no active cement batching occurred during the site audit. According to the site agent, mortar boards are in place where cement has been utilised for the construction of Field C.
4.5	Cleaning of cement mixing and handling equipment shall be done using proper cleaning trays.	Noted, no active cement batching occurred during the site audit. The contractor's yard/site camp has all the necessary cleaning trays.
4.6	All empty containers must be stored in a dedicated area and later removed from the site for appropriate disposal at a Licensed	Noted, waste bins are located near the works area. No empty containers or cement bags were noted during the site audit.

	Landfill site. All empty cement bags are to be picked up immediately to ensure that cement dust is not blown away.	Please refer to the waste disposal slips attached as Appendix H.
4.7	Empty cement bags are to be stored in a weather and scavenger proof bin, in order to prevent leaching and groundwater contamination.	Noted, waste bins are located near the works area. No empty containers or cement bags were noted during the site audit.
4.8	Any spillage that may occur must be investigated and immediate remedial action shall be taken.	No cement remains were observed during the site audit.
4.9	The visible remains of concrete, either solid, or from washings, shall be physically removed immediately and disposed of as waste to a Licensed Landfill site.	No cement remains were observed during the site audit.
4.10	Washing of the remains into the ground is unacceptable.	No cement remains were observed during the site audit.
4.11	Should any cement silos be employed on site; they are to be fitted with appropriate air pollution control equipment to control dust during fill-up operations.	Noted, no active cement batching occurred during the site audit.
5.	**Oil and Chemicals**	
5.1	These substances must be confined to specific and secured areas within the contractor's camp, and in a way that does not pose a danger of pollution even during times of high rainfall. **These areas must be imperviously bunded with adequate containment (at least 1.1 times the volume of the fuel) for potential spills or leaks.**	Chemicals etc. was stored in the site camp within a secure lockable container. A spill kit was available within the site camp.
5.2	Drip trays (minimum of 10cm deep) must be placed under all machinery and vehicles. The surface area of the drip trays will be dependent on the vehicle and must be large enough to catch any hydrocarbons that may leak from the vehicle while standing. The depth of the drip tray must be determined considering the total amount / volume of oil in the vehicle. The drip tray must be able to contain the volume of oil in the vehicle.	A drip tray was positioned beneath the fuel browser at the site camp. Additionally, a designated maintenance and refuelling area with an impermeable surface has been established within the site camp, which will also accommodate the athletes' accommodation pods.

5.3	Any spills larger than 100ℓ should be reported to all local authorities. Spill kits must be available on site and in all vehicles that transport hydrocarbons for dispensing to other vehicles on the construction site. Spill kits must be made up of material/product that is in line with environmental best practice (sunsorb is a recommended product that is environmentally friendly).	Chemicals etc. was stored in the site camp within a secure lockable container. A spill kit was available within the site camp.
5.4	All spilled hazardous substances must be contained in impermeable containers for removal to a General & Hazardous Waste Landfill site, (this includes contaminated soils, and drenched spill kit material).	No spills were observed at the time of the site audit.
5.5	Vehicles to be serviced at the contractor laydown area and all refuelling to take place outside of the watercourses and the applicable variable buffer.	A drip tray was positioned beneath the fuel browser at the site camp. Additionally, a designated maintenance and refuelling area with an impermeable surface has been established within the site camp
6.	**Method Statements** The contractor must provide method statements on the protocols to be followed, and contingencies to be put in place for the following, before construction may begin: • Emergency spills procedures for the contamination of soils from spills and fire. • Handling & storage of oils and chemicals. • Cement and concrete batching, which includes the storage, washing & disposal of cement, packaging, tools and plant. • Diesel tanks and refuelling procedures. • Crew camps and construction laydown areas. • Workshop maintenance and cleaning of plant.	Method statements and all required documents were available at the site office.
7. 7.1	**Dangerous and Toxic Materials** Materials such as fuel, oil, paint, herbicide and insecticides must be	Chemicals and materials such as fuel, oil, paint, herbicides, and

	sealed and stored in bermed areas or under lock and key, as appropriate, in well-ventilated areas.	insecticides were stored securely on-site within a lockable container located in the site camp, ensuring controlled access and compliance with safety protocols.
7.2	Storage facilities should be bunded, roofed, secure, rain, wind and tamper-proof.	Chemicals and materials such as fuel, oil, paint, herbicides, and insecticides were stored securely on-site within a lockable container located in the site camp, ensuring controlled access and compliance with safety protocols.
7.3	Storage areas shall display the required safety signs depicting “no smoking”, “No Naked lights” and “Danger” containers shall be clearly marked to indicate contents as well as safety requirements.	All storage containers were marked with the necessary safety signs.
7.4	Sufficient care must be taken when handling these materials to prevent pollution. Training on the handling of dangerous and toxic materials must be conducted for all staff prior to the commencement of construction. In the case of pollution of any surface or groundwater, the Regional Representative of the **Department of Water and Sanitation** (DWS) must be informed immediately.	Training is part of the inductions done by the contractor and site agent. An induction was also conducted by the ECO prior to the commencement of the construction activities.
7.5	Excess grease will be removed from any and all machinery before plant works in or near any watercourses.	Noted, no works near any watercourses are foreseen.
7.6	All hazardous material (temporary toilets, fuel storage tanks, lubricants, paints, cement, cement additives, etc.) will be kept a minimum of 32 metres from the watercourse(s) and will be properly secured.	Noted, no works or storage of hazardous material near any watercourses are foreseen.
8.	**Bulk Storage of Fuels and Oils**	
8.1	Bulk fuel storage tanks on the site shall be on an impervious surface that is bunded and able to contain at least 110% of the volume of the tanks.	No bulk fuel is stored on site.
8.2	Bulk fuel storage tanks shall be located in a portion of the	No bulk fuel is stored on site.

	construction camp where they do not pose a high risk in terms of water pollution.	
8.3	Bulk fuel storage tanks shall be placed so that they are out of the way of traffic, so that the risk of the tanks being ruptured or damaged by vehicles is minimised.	No bulk fuel is stored on site.
8.4	Bulk fuel storage should be covered during the rainy season.	No bulk fuel is stored on site.
9. 9.1	**Use of Dangerous and Toxic Materials** The contractor shall keep the necessary materials and equipment on-site to deal with spills/fires of the materials present should they occur.	The contractor has ensured that all necessary materials and equipment to manage potential spills or fires related to on-site materials are readily available and maintained at the site.
9.2	The contractor shall set up a procedure for dealing with spills/fires, which will include notifying the ECO and the relevant authorities prior to commencing construction. These procedures must be developed in consultation and approval by the appointed EO. All staff should receive some form of fire training.	Method statements and all required procedural documents were available at the site office.
9.3	Fire buckets and hoses shall be in good working order and easily accessible on site.	Firefighting equipment is readily available at the contractor's camp, site camp and site office.
10. 10.1	**Contractors Camp Site and Crew Camps** The Contractor shall, in conjunction with the EO, designate the restricted eating area for eating during normal working hours. Two refuse bins with lids must be provided and cleaned on a daily basis. The bins are to be secure, wind, weather and scavenger proof. Designated areas for smoking must be provided.	A designated eating area, which is screened for privacy, has been established on-site. Additionally, a designated smoking area has been provided. Both areas are supported by a kitchen and rest area located within a container. Refuse bins with lids, which are secure against wind, weather, and scavengers, have been supplied.
10.2	No fires are to be lit outside of a facility designed to contain fires. The adequacy and positioning of these structures must be determined in consultation with the EO and ECO.	No evidence of fires was observed during the site audit.

10.3	No animals, domestic or otherwise are allowed on the premises. The feeding, or leaving of food, for stray or other animals in the area is strictly prohibited.	No animals, domestic or otherwise, were observed on the premises during the site audit. There was no evidence of feeding or leaving food for stray or other animals in the area.
10.4	Litter (even if originating outside the camp) and concrete bags etc. must be picked up and put into suitably closed bins. The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure compliance with this requirement. Rubble and litter must be removed every two weeks or more often as the need arises and be disposed of at a registered landfill site.	No litter was observed during the audit, and the general condition of the site is commendably clean and orderly.
10.5	Accommodation for members of the workforce will not be permitted on site unless authorisation has been given in terms of the Environmental Authorisation issued for the site.	No accommodation of the workforce has been permitted.
10.6	Dedicated wash areas must be situated away from surface water sources.	Complied with. A designated eating area, which is screened for privacy, has been established on-site. Additionally, a designated smoking area has been provided. Both areas are supported by a kitchen (wash area) and rest area located within a container.
10.7	The contractor's camp shall be monitored for dust fallout and dust suppression applied as required. This may include the laying of gravel; the use of grey water can be considered as an option if the required permits have been acquired.	Dust suppression measures are actively in place on site, utilising stored borehole water and making use of the on-site water filling station. Recent rainfall has reduced the need for frequent dust control.
10.8	The contractor's camp, offices and storage facilities shall be located within the site boundaries. If this is not feasible an alternative should be designated in consultation with the ECO.	The contractor's camp, offices, and storage facilities have been located within the designated parking and accommodation area, which falls within the site boundaries.
10.9	The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure	No litter was observed during the audit, and the general condition of the site is commendably clean and orderly.

	compliance with this requirement.	
10.10	The contractor shall be responsible for cleaning the contractor's camp and construction site of all structures, equipment, residual litter and building materials at the end of the construction period and, the topsoil restored in areas where landscaping is to take place.	No litter was observed during the audit, and the general condition of the site is commendably clean and orderly. Rehabilitation of construction areas is undertaken regularly, where possible.
11. 11.1	**Ablution Facilities** The contractor will be responsible for providing all sanitary arrangements for his and the sub-contractors team. It is proposed that that **one toilet for 15** people will be established on site.	Sufficient ablution facilities are provided and maintained. Two secure chemical toilets have been placed near the contractor's camp and the current works area (Field B being levelled and reseeded), which is in a hygienic condition.
11.2	Sanitary arrangements shall be to the satisfaction of the ECO and the local authority. The contractor shall keep the toilets in a clean, neat and hygienic condition. The **contractor shall supply toilet paper at all toilets at all times**. Toilet paper dispensers shall be provided in all toilets.	During the site audit, both toilets appeared to be in a clean, neat, and hygienic condition.
11.3	Toilets provided by the contractor must be easily accessible and a maximum of 150m from the works area to ensure they are utilised. All toilets will be located within the contractor's camp. Should toilets be needed elsewhere, their location must first be approved by the ER, ECO.	Sufficient ablution facilities are provided and maintained. Two secure chemical toilets have been placed near the contractor's camp and the current works area (Field B being levelled and reseeded).
11.4	The contractor (who must use reputable toilet-servicing company) shall be responsible for the cleaning, maintenance and servicing of the toilets. The contractor (using reputable toilet-servicing company) shall ensure that all toilets are cleaned and emptied before the builders' or other public holidays.	During the site audit, both toilets appeared to be in a clean, neat, and hygienic condition.
11.5	Toilets out on site must be secured to the ground and have a sufficient locking mechanism operational at all times.	The two onsite toilets have been stabilized using sandbags and are equipped with secure internal locking mechanisms to ensure

		user safety and privacy.
12.	**Dust**	
12.1	Potable water may not be used as a means of dust suppression, alternative measures must be sourced. The use of 'grey' water must be investigated as an alternative. The contractor will be responsible to source this water and obtain the required approvals. Dust mitigation measures to include the use of chemical dust suppressants, such as Lignosulphonates; and the use of soil stabilisers such as straw for large open ground areas.	Dust suppression measures are actively in place on site, utilising stored borehole water and making use of the on-site water filling station. Recent rainfall has reduced the need for frequent dust control.
12.2	The construction camp shall be treated with dust suppression during dry and windy conditions to control dust fallout. Dust production must be controlled by regular dust suppression of roads and works area, should the need arise. (NB: Concrete dust is toxic and damages soil properties. Therefore dust suppression to prevent dust spread must not be done where concrete dust has fallen or it will infiltrate into the soil. Concrete bags must not be allowed to blow around the site and spread cement dust.)	During the site audit, no visible dust fallout was observed. Dust suppression measures are actively implemented on site, making use of stored borehole water and the on-site water filling station. These measures are employed particularly during dry and windy conditions to control dust generation across the construction camp, roads, and work areas. Additionally, recent rainfall has reduced the immediate need for frequent dust suppression. No evidence of concrete dust spread or improper handling of cement bags was noted at the time of the audit.
12.3	At the end of construction, the site camp must be fully rehabilitated by removing the temporary surface and ripping the area to loosen the soil.	Noted, this will be audited at a later stage. Please note rehabilitation and landscaping activities are being carried out progressively alongside ongoing construction work where possible.
12.4	All vehicles transporting material that can be blown off (e.g. soil, rubble etc.) must be covered with a tarpaulin, and speed limits of 20 km/h must be adhered to.	Noted. At the time of the site audit, no material transport, stockpiling, or trenching activities were observed on site.
12.5	Loads that may be subject to loss through wind erosion or accidental spillage must be totally and securely covered or sealed. Loose material should be cleaned from trucks before they leave the	At the time of the site audit, no loading or offloading activities were observed, and no materials were being transported that posed a risk of spillage or wind erosion. Consequently, no spills were

	site. When loading, and unloading, prevent spillage of materials on to the road. Any accidental spills must be cleaned up immediately so as to revent the material from entering the stormwater system.	noted on the access roads or surrounding areas.
13.	**Noise**	
13.1	Work hours during the construction phase shall be strictly enforced unless permission is given (07H00 – 18H00). Permission shall not be granted without consultation with the local industries and businesses by the EO. No work to be done on Sundays. The EO must inform the residents of houses and businesses adjacent to the development in writing 24 hours prior to any planned activities that will be unusually noisy or any other activities that could reasonably have an impact on the adjacent sites. These activities could include, but are not limited to use of pneumatic jack-hammers and compressors etc. No noise louder than 70dB from the ambient noise level.	No complaints were recorded to date. Work took place within the designated working hours.
13.2	Noise reduction is essential and Contractors shall endeavour to limit unnecessary noise, especially loud talking, shouting or whistling, radios, sirens or hooters, motor revving, etc. The use of silent compressors is a specific requirement. All machinery to be muffled where possible.	Noted. To date, no complaints have been recorded regarding construction activities, including any issues related to excessive noise generated by machinery on site.
13.3	**Mitigation as proposed by the Noise Impact Assessment conducted by Safetech (2023):** • As a precautionary measure, construction should not occur at night. Construction to only be done during daytime hours. • All staff on the construction project should receive training to mitigate the noise impacts. • It is recommended that the ambient noise (with construction occurring) around the project and at the closest receptors	Noted. To date, no complaints have been recorded regarding construction activities, including any issues related to excessive noise generated by machinery on site.

	be monitored during the construction phase. • Equipment to be regularly serviced and maintained to avoid unnecessary noise. • Noise monitoring during the construction period.	
13.4	The following noise mitigations are applicable should the primates be located adjacent to the proposed development site during construction phase: • A noise barrier to be erected on the western fence of the animal enclosures. This to be erected prior to any heavy construction equipment or pile driving on site, if applicable. • Weekly communication with Monkey Town on the location and extent of construction equipment and activities to assess the impact on the animals. • Primate Specialist to be appointed to monitor the animals behaviour during construction near the Monkey Town boundary, if applicable. The Primate Specialist to determine if extra mitigation measures are required.	Noise monitoring has not been conducted on site, as the chimpanzees previously housed at MonkeyTown have been relocated, which was the primary reason for the noise surveys. Therefore, this requirement is no longer applicable. The appointment of a suitably qualified individual to record and monitor the behaviour and physiology of the chimpanzees prior to the commencement of development is no longer required, as Monkey World has been closed and the chimpanzees have been relocated.
14. 14.1	**Fires** Fire training and equipment to be nearby to put fires out. **The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.**	Firefighting equipment is readily available at the contractor's camp, site camp and site office.
14.2	Fires must be within designated areas and must be in small scale. Absolutely no burning of waste is permitted.	No evidence of fires was observed during the site audit.
14.3	Fires will only be allowed in facilities especially constructed for this purpose within fenced Contractor's camps. Wood and/or charcoal are the only fuels permitted to be used for fires. The contractor must provide sufficient wood (fuel) for this purpose. Fires in the designated areas must be small in scale so as to	No evidence of fires was observed during the site audit.

	prevent excessive smoke being released into the atmosphere. Heavy smoke may not be released into the air.	
14.4	**The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.** The construction should comply with SANS 10400 of 2011 and the Community Fire Safety By-Law, Provincial Gazette 5832 (as amended 29 June 2007 and 21 August 2015), with reference to: • Detailed fire protection plans should be submitted by a competent person – fire engineer for perusal of future building plan submissions; • Fire hydrants to be provided as per SANS 100400 T4.35; • No window, door or unprotected openings shall be closer than 3 m of an open space stair as per SANS 10400 T4.27.2; • Access for emergency vehicles as per Chapter 3 Section 12 of the Community Fire Safety By-law.	A fire protection plan has been developed, and fire safety equipment is available at the site office for use in case of emergency.
15. 15.1	**Erosion and Sedimentation** To reduce the loss of material by erosion, the contractor shall ensure that disturbance on site is kept to a minimum. The disturbance especially includes the movement of heavy vehicles. These areas must be cordoned off so that vehicles or construction personnel cannot gain access to these areas.	The access roads currently in use are aligned with the planned formal road layout, minimizing unnecessary site clearance and disturbance. No additional or unapproved areas have been cleared. The movement of heavy vehicles is limited to these designated routes, and disturbance to surrounding areas has been kept to a minimum.
15.2	The contractor shall be responsible for rehabilitating all eroded areas in such a way that the erosion potential is minimised after construction has been completed. These areas are to be filled with mulch or funnels constructed to route the water. All disturbed areas that will not be rehabilitated within the construction phase, must be	Rehabilitation and landscaping are being carried out progressively alongside construction activities. The contractor has obtained stockpiles of topsoil and mulch, which are used as needed in areas requiring rehabilitation.

	mulched to encourage vegetation re-growth. Mulch used must be free from alien seed.	
15.3	In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.	Currently, the stockpiled material on site is not adequately secured to withstand excessive wind or rain. The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Due to this ongoing usage, it is impractical to cover these large, frequently accessed stockpiles with tarpaulins or install geotextile protection as required. Although the laydown areas are located within designated zones away from sensitive environmental features, the current management approach does not fully comply with the specified condition regarding erosion control and protection against environmental degradation during adverse weather. The auditor suggests that the contractor designate smaller, more contained stockpile areas where possible. Cover less frequently accessed stockpiles with tarpaulins or geotextile when not in immediate use. Schedule and record regular checks before forecasted rain or high winds to secure materials and prevent runoff.
16. 16.1	**Fauna** All construction workers must be informed that the intentional killing of any animal is not permitted as faunal species are a benefit to society. Poaching is illegal and it must be a condition of employment that any employee caught poaching will be dismissed.	No harm to wildlife has been reported to date. As a precautionary measure, the contractor has incorporated snake handling awareness and reporting procedures into the site induction process.

	Employees must be trained on how to deal with fauna species as intentional killing will not be tolerated. In the case of a problem animal e.g. a large snake a specialist must be called in to safely relocate the animal if the EO or ECO is not able to.	
17. 17.1	**Flora** No open fires shall be allowed on site under any circumstances, fires will only be permitted in adequate facility within the crew camp, Forest Act, 1984 (Act No. 122 of 1984).	No evidence of fires was observed during the site audit.
17.2	The contractor must rehabilitate the construction camp and any other disturbed areas once construction activities have terminated.	Noted, this will be audited at a later stage. Please note rehabilitation and landscaping activities are being carried out progressively alongside ongoing construction work where possible.
17.3	Three (3) Outeniqua yellowwood trees (Afrocarpus falcatus) are present on the southern boundary of Portion 63 of Farm No. 918. At this point in time, the two of the three Outeniqua Yellowwood trees will be retained and not impacted by the proposed development. Application under Section 15(1) of the National Forest Act, 1998, as amended, will be made to obtain a licence for the removal of one of the trees.	The boundary walls surrounding the development have been completed, and all existing trees on the site remain unharmed. Importantly, the Outeniqua yellowwood trees are located within Monkey Town's perimeter and not affected by the construction activities, as they fall outside the designated development footprint.
18. 18.1	**No-go / sensitive areas** Topsoil stockpiles are to be demarcated with danger tape and seen as no-go areas.	The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Due to this ongoing usage, it is impractical to cover and completely demarcate these large, frequently accessed stockpiles. The auditor suggests that the contractor designate smaller, more

		contained topsoil stockpiles where possible, and add a notice board saying this is a no-go area.
18.2	All construction activities must remain within the boundaries of the development area, as demarcated at the start of the construction phase. The construction footprint must be kept to a minimum by constructing boundaries and demarcated around areas not to be disturbed.	All construction activities have remained within the designated development boundaries as demarcated at the start of the construction phase.
18.3	These No-go areas must be **demarcated with fencing / warning tape** and signs before any construction activities commence. These areas and the type of fencing/demarcation must be approved by the relevant specialist involved in the EIA process. The EO and ECO must be on site in order to make sure the correct areas are fully demarcated.	The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Due to this ongoing usage, it is impractical to cover and completely demarcate these large, frequently accessed stockpiles. The auditor suggests that the contractor designate smaller, more contained topsoil stockpiles where possible, and add a notice board saying this is a no-go area.
19.	**Hydrology**	
19.1	Increased run-off during construction must be managed using suitable structures as required to ensure flow velocities are reduced; this must be done in consultation with the Resident engineer as well as the ECO. The Contractor shall take reasonable measures to control the erosive effects of storm water runoff (If and where applicable).	A temporary stormwater management structure has been installed along the northwestern boundary of the site, adjacent to Dinsley Walk and the emergency exit. This structure features rock-filled channels specifically designed to control and dissipate runoff, thereby reducing flow velocities and minimizing erosive effects.
19.2	Stormwater, wherever possible, should be allowed to soak into the land in the area on which the water fell.	A temporary stormwater management structure has been installed along the northwestern boundary of the site, adjacent to Dinsley Walk and the emergency exit. This structure features rock-filled channels specifically designed to control and dissipate runoff, thereby reducing flow velocities and minimizing erosive

		effects.
19.3	In the event of pollution caused as a result of construction activities, the contractor, according to section 20 of the National Water Act, 1998 (Act No. 36 of 1998) shall be responsible for all costs incurred by organisations called to assist in pollution control and/or to clean up polluted areas and water courses.	No evidence of pollution affecting water resources or the surrounding area was observed during the site audit.
19.4	The contractor shall ensure that excessive quantities of sand, silt and silt-laden water do not enter the stormwater system.	The contractor has implemented appropriate measures to prevent excessive quantities of sand, silt, and silt-laden water from entering the stormwater system. Specifically, rock-filled channels have been installed to reduce flow velocity and trap sediment.
19.5	Dirty water should be captured, to be re-used where possible. No dirty water is allowed to be discharged into the surrounding environment.	The contractor confirms that no wastewater or runoff is discharged into the surrounding environment. Dirty water is effectively captured and reused wherever possible. To facilitate this, JoJo tanks and a reservoir have been installed on-site to store excess borehole water, which is then utilised for irrigation purposes.
19.6	No wastewater may run freely into any of the surrounding streets.	At the time of the audit, no runoff was observed towards the surrounding area.
19.7	Install sediment collection devices to prevent the export of sediment from the site. Locate sediment traps and basins in locations that will not create adverse flood risks to adjoining properties.	The contractor has implemented appropriate measures to prevent excessive quantities of sand, silt, and silt-laden water from entering the stormwater system. Specifically, rock-filled channels have been installed to reduce flow velocity and trap sediment.
19.8	Monitoring boreholes must be installed on site for regular groundwater monitoring purposes.	The Holder is in the process of installing groundwater monitoring systems and has received quotes for the required installation.
19.9	All treated effluent from the package plant must be metered and a monthly water quality analysis undertaken by taking a grab sample and analysing it for the specific substances and parameters	The package plant has not yet been constructed; therefore, metering and monthly water quality analysis of treated effluent will be audited once the system is operational. According to the site agent, the Holder is currently in the process of installing groundwater monitoring meters and has received quotes for the

		required installation to enable monthly oversight. At present, water quality analysis is being conducted every three months to monitor groundwater conditions.
19.10	It is recommended that Sustainable Drainage Systems (SuDS) be utilised as they will assist with further polishing of treated effluent water.	Noted, this will be audited once the package plant has been constructed and is operational.
20.	**Stormwater**	
20.1	Oil / water separators must be installed on the stormwater system, at the outfall of the parking areas, prior to discharge into the stormwater pond, in order to remove oils / hydrocarbons from stormwater runoff from the parking areas.	The contractor is currently excavating trenches for the installation of the bulk stormwater pipeline, which will include the placement of oil/water separators at the outfall of the parking areas as required. The installation and effectiveness of these separators will be audited once the system is operational.
20.2	Prominently displayed safety signage must be placed in the vicinity of each stormwater attenuation and treatment facility, warning owners, tenants, staff and the public that water levels within the stormwater facility will temporarily rise during storm events and that water may be contaminated.	Noted. Safety signage warning of temporary water level rises and potential contamination during storm events will be prominently displayed at all stormwater attenuation and treatment facilities once constructed.
20.3	Mortar must not be mixed in gutters or any other location, which will drain to the stormwater system.	No active cement batching or mortar mixing took place during the site audit. Appropriate mortar boards and trays have been used to prevent any mortar or cement from draining into the stormwater system according to the site agent.
20.4	All wastewater from brick cutting activities must be prevented from entering the stormwater system.	No brick cutting activities took place during the site audit.
20.5	Brick cutting activities that generate surplus wastewater should not be carried out on public roads, footpaths or reserves.	No brick cutting activities took place during the site audit.
20.6	Paint waste and wash waters must not be discharged to the stormwater system.	No painting or washing of paints, cement, or other chemicals took place during the site audit.

20.7	Water-based paint cleaning water should be disposed of to sewer or diverted into a contained area lined with newspaper on-site. When it is dry, place the newspaper with paint residue in a solid waste bin.	No painting or washing of paints, cement, or other chemicals took place during the site audit.
20.8	Oil-based clean up material should be filtered for reuse of the solvent or taken to a waste depot that is licensed to accept these wastes. Place the paint residue after filtering in a solid waste bin.	No painting or washing of paints, cement, or other chemicals took place during the site audit.
20.9	Unused paint should be kept in the tin or other sealed container and disposed of to a waste depot licensed to receive this waste.	No painting or washing of paints, cement, or other chemicals took place during the site audit.
20.10	Plastering waste and wash waters must not be discharged to the stormwater system.	No plastering or washing of other chemicals took place during the site audit.
20.11	All residues and wastes from plastering activities should be allowed to dry within a designated contained area of the site. Solid waste should be disposed of either on-site or taken to a licensed waste depot.	No plastering or washing of other chemicals took place during the site audit.
20.12	Alternatively, solid wastes from plastering activities such as calcium sulphate may be used as a clay modifier in gardens.	No plastering or washing of other chemicals took place during the site audit.
20.13	All stormwater to be managed in accordance with the Stormwater Management Plan complied by UDS Africa. 2023.	The contractor is currently busy installing the bulk stormwater pipeline. In the interim, rock-filled channels have been installed to manage stormwater runoff effectively until the permanent system is fully operational.
20.14	Hardstanding must be used on site to underlie parking areas. Runoff from the hardstanding to discharge into the stormwater system.	Noted. Parking areas have not yet been constructed on site.
20.15	A proper stormwater system needs to be developed so as to catch any surface run-off.	Noted. The contractor is currently busy installing the bulk stormwater pipeline. In the interim, rock-filled channels have been installed to manage stormwater runoff effectively until the

		permanent system is fully operational.
20.16	The containment slab must be graded to drain to a catch-pit that is connected to discharge to the stormwater system while the surrounding paved surface areas must be graded to ensure rainwater runoff to the stormwater system.	During the site audit, no containment slab was observed. At the site camp, the contractor has laid small stones in the fueling and maintenance area to help dissipate any spillage. A spillage kit is regularly used where necessary, and this area is located within the zone where the parking area will eventually be constructed.
21.	**Soil**	
21.1	Topsoil must be stripped from all areas that are to be utilised during the construction period and where permanent structures and access are required. These areas will include the permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas.	Noted. Substantial amounts of topsoil have been stripped during the construction of Field A, B, and C, and layering works, and have been carefully placed within the designated laydown areas as required.
21.2	All topsoil must be removed and stockpiled on the site.	Substantial amounts of topsoil have been stripped during the construction of Field A, B, and C, and layering works, and have been carefully placed within the designated laydown areas as required.
21.3	Single handling is recommended. Stockpiles must not be higher than 2m to avoid compaction.	Currently, the stockpiled material on site is not adequately secured to withstand excessive wind or rain. The stockpiles are substantial in volume and are in continuous use as part of the active construction process, particularly for levelling and rehabilitation activities across the site. Due to this ongoing usage, it is impractical to cover these large, frequently accessed stockpiles with tarpaulins or install geotextile protection as required. Although the laydown areas are located within designated zones away from sensitive environmental features, the current management approach does not fully comply with the specified

		condition regarding erosion control and protection against environmental degradation during adverse weather. The auditor suggests that the contractor designate smaller, more contained stockpile areas where possible. Cover less frequently accessed stockpiles with tarpaulins or geotextile when not in immediate use. Schedule and record regular checks before forecasted rain or high winds to secure materials and prevent runoff.
21.4	Dust suppression is necessary for stockpiles older than a month – with either water or a biodegradable chemical binding agent.	Dust suppression measures are actively in place on site, utilising stored borehole water and making use of the on-site water filling station. Recent rainfall has reduced the need for frequent dust control.
21.5	Backfill will require contouring to ensure that it blends in with the surrounding environment.	Shaping of the embankments has been carried out along with rehabilitation in designated areas. Once the bulk stormwater pipeline is installed, the trenches will be backfilled and contoured to blend in with the surrounding environment, as required.

EMPr Compliance Rating	**98.08%**

CONCLUSION

Based on the findings of the external site audit conducted on 8 May 2025, it can be concluded that the applicant has generally complied with the conditions set out in the Environmental Authorisation (EA) and Environmental Management Programme (EMPr). The EMPr is regarded as effective in guiding and mitigating the environmental impacts associated with the construction activities observed on site.

The audit did not reveal any direct contradictions between the EA and EMPr. While overall compliance has been satisfactory, a few non-compliances were recorded, specifically in relation to Condition 7 and Condition 10 of the EA. In addition, partial compliance was noted for Condition 5 and Condition 13, as detailed in Table 2 of this report.

The non-compliance recorded pertains to early commencement of construction without prior notification to the ECO, resulting in uncertainty on the part of both the auditor and the ECO as to whether a sufficient appeal period was observed prior to commencement.

Any partial non-compliance with the EMPr has been noted within Table 6.

No major environmental risks or unmanaged impacts were identified that would warrant triggering a public participation process in terms of Regulation 34(5) of the EIA Regulations. As such, no further public engagement will be undertaken at this stage.

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:

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS

Entrance of the site off Mondeor Road where the boundary wall has been constructed.

Entrance of the site off Mondeor Road where the boundary wall has been constructed.

Entrance of the site off Mondeor Road where the boundary wall has been constructed.

Entrance of the site off Mondeor Road.

Anchoring of the palm tree using cables and ropes to stabilise the tree for landscaping.

Landscaped southern slopes towards the entrance of the site off Mondeor Road.

Landscaped southern slopes towards the entrance of the site off Mondeor Road.

Landscaped southern slopes towards the entrance of the site off Mondeor Road.

Landscaped southern slopes.

Landscaped southern slopes.

Entrance to the site.

Proposed southern bus parking area.

Proposed southern bus parking area.

Proposed southern bus parking area.

Sieved material stockpiles at the entrance of the site where the workshop will be located.

Emergency assembly notice board in places near the entrance off Mondeor Road.

Vibrating screen used for the separation of rocks by size.

Temporary material stockpiles for the layered roads works.

 Rock stockpiles use for temporary stormwater mitigation where necessary.	 Small, succulents (vygies) being used for landscaping at the entrance of the site along the eastern boundary.
 Towards the entrance of the site where the workshop will be located.	 Contractor's camp.
 Solar panels temporarily installed and utilised until the completion of the parking area.	 Southeastern borehole located at the entrance of the site towards the right.

 Southeastern borehole located at the entrance of the site towards the right.	 Secured chemical toilet and bins in place adjacent the current works area.
 Temporary building material stockpiles.	 Designated smoking area notice board adjacent eating and lounging area.
 Solar panels temporarily installed and utilised until the completion of the parking area.	 Salvaged plants on site to be used during rehabilitation.

 Solar panels temporarily installed and utilised until the completion of the parking area.	 Temporary G5 material and topsoil stockpiles for layered road works and levelling of the sports fields.
 Condition of the demarcated and contained contractor's yard.	 Condition of the demarcated and contained contractor's yard.
 Water filling station for dust suppression.	 Condition of the demarcated and contained contractor's yard.

Fuel browser with drip tray in place.

Condition of the demarcated and contained contractor's yard.

Condition of the demarcated and contained contractor's yard.

Condition of the demarcated and contained contractor's yard.

Maintenance and refuelling area within the contractor's yard.

Oil spill kit available on-site within a lockable container.

Safety information board displayed on the container housing the safety equipment.

Designated eating and lounging area.

Site safety information board.

Borehole and stormwater installation in progress towards the southeastern property boundary.

Temporary G5 material stockpiles for layered road works and levelling of the sports fields.

Borehole installation in progress towards the southeastern property boundary.

 Temporary G5 material stockpiles for layered road works and levelling of the sports fields.	 Temporary topsoil and mulch stockpiles continuously used.
 Area between Field A and Field B where the clubhouse will be constructed.	 Field A embankment.
 Eastern boundary of the property, adjacent to the former Monkey Town area.	 Condition of Field A.

 Eastern property boundary where the other sports field will be located.	 Field C embankment towards the east.
 Preparation for the installation of the bulk stormwater pipeline along the eastern boundary of Field A	 Field C embankment towards the east.
 Preparation for the installation of the bulk stormwater pipeline along the eastern boundary of Field C.	 Field C embankment towards the east.

 Southeastern property boundary adjacent to Field A, where the bulk stormwater pipeline will be installed.	 Northwestern property boundary adjacent to Field C, where accommodation pods are to be placed.
 Field A being levelled and reseeded.	 Northwestern property boundary adjacent to Field C, where the field has been staked out.
 Cleared area designated for the reed bed and package plant installation.	 Area cleared and being levelled in preparation for attenuation pond construction.

Field C prepared and cemented for sand-based astro field installation.

Trenches are currently being excavated for the installation of the bulk stormwater pipeline.

Trenches are currently being excavated for the installation of the bulk stormwater pipeline.

Stormwater outlet located in the western corner, along with the municipal water connection point

Condition of Field A, currently being levelled out with sand and being reseeded.

Natural trees will be retained on site within the area where the clubhouse will be situated.

Temporary stormwater measures in place adjacent to the northern corner of Field B.

Area between Field A and Field B where the clubhouse will be constructed.

View of Field B towards the northeast embankment and pavilion.

The northeastern embankment of Field B, to be landscaped along with accommodation pods placed.

The northeastern embankment of Field B. Retention wall will be landscaped. Note the stormwater drain installed.

The northeastern Field B embankment, pavilion, and concrete retention wall have been constructed.

Chemical toilet and emergency assembly point for work at field B along the northeastern property boundary.

Jojo tanks and reservoir used for water storage (borehole).

Condition and concrete retaining wall of Field B.

Mulch and toposoil stockpiles continueously used.

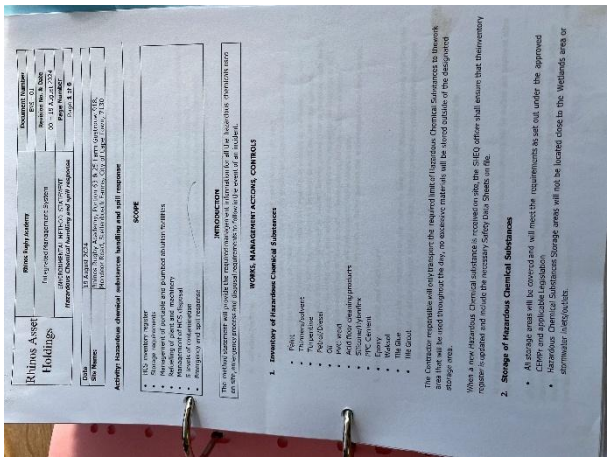
Locable container as the inverter room.

Site Camp designated eating area.

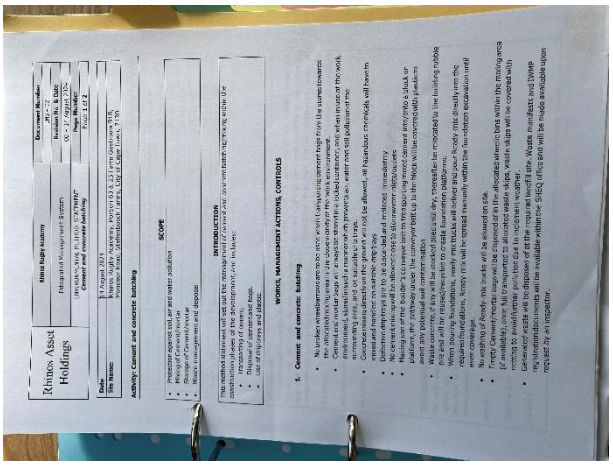
Access along Mondeor Road.

Emergency access off Dinsley Walk road.

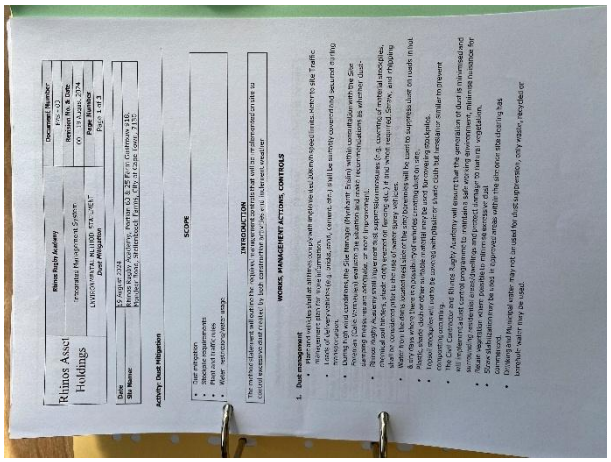
Environmental File



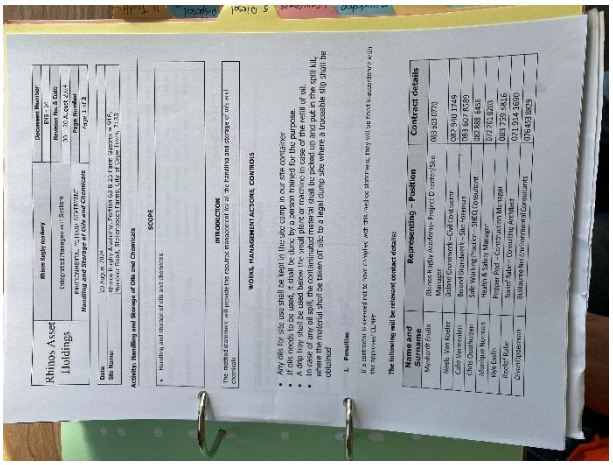
Method statement for Hazardous Chemical handling and Spill Response.



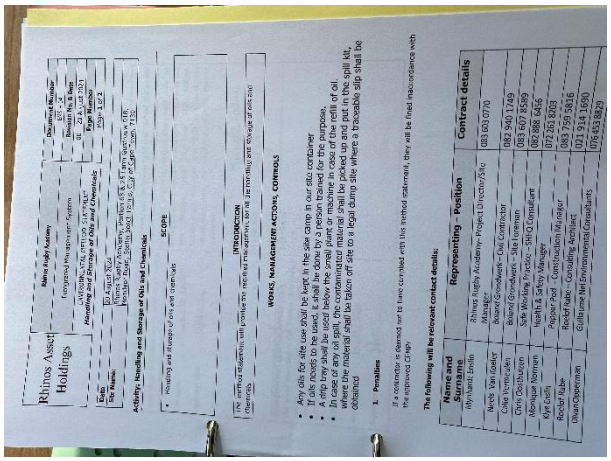
Method statement for Cement and Concrete Batching.



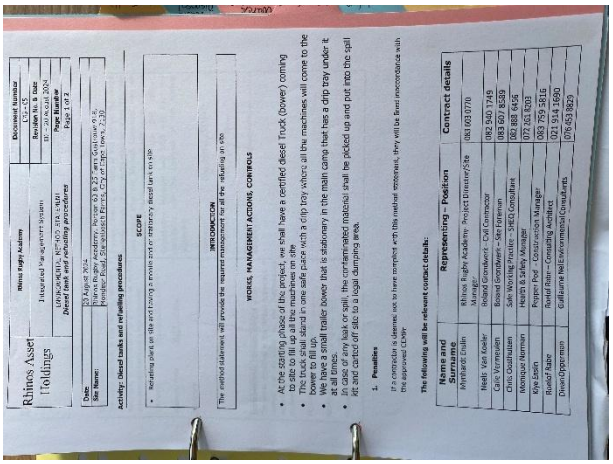
Method statement for Dust Mitigation.



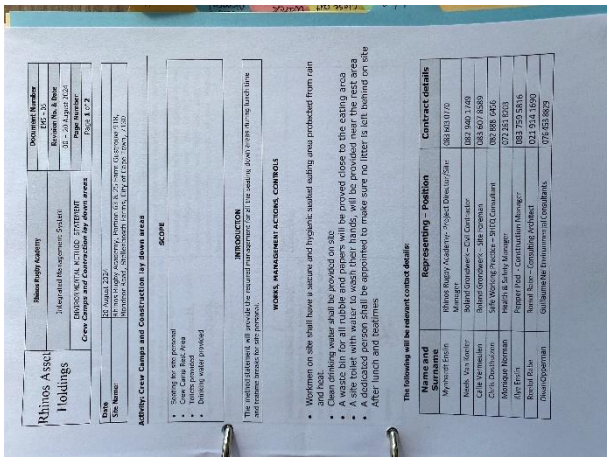
Method statement for Handling and Storage of Oils and Chemicals.



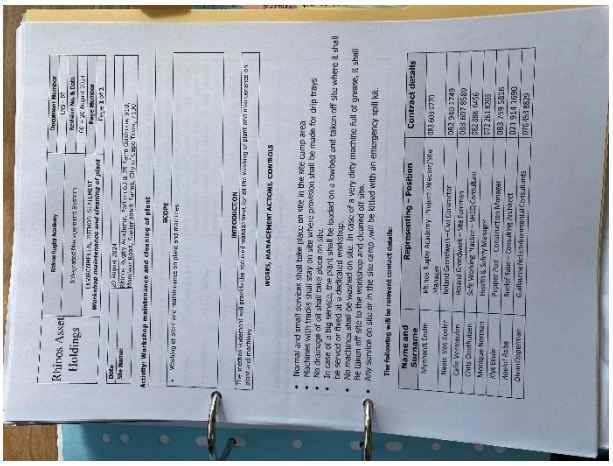
Method statement for Handling and Storage of Oils and Chemicals.



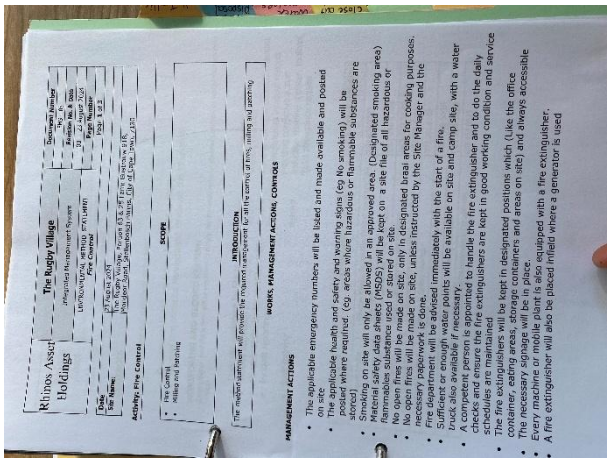
Method statement for Diesel Tank and Refuelling Procedures.



Method statement for Crew Camps and Construction Laydown Areas.

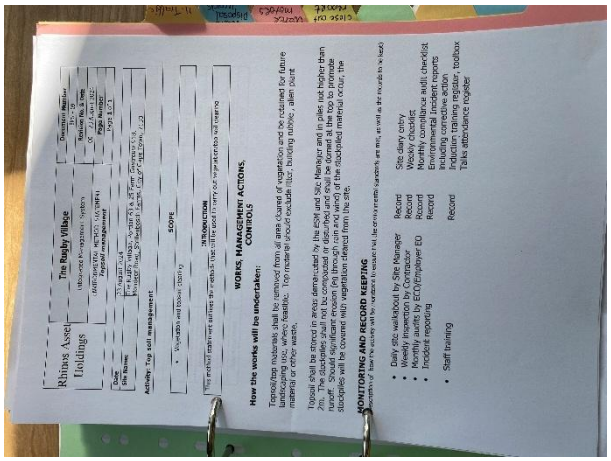


Method statement for Workshop Maintenance and Cleaning of Plant.

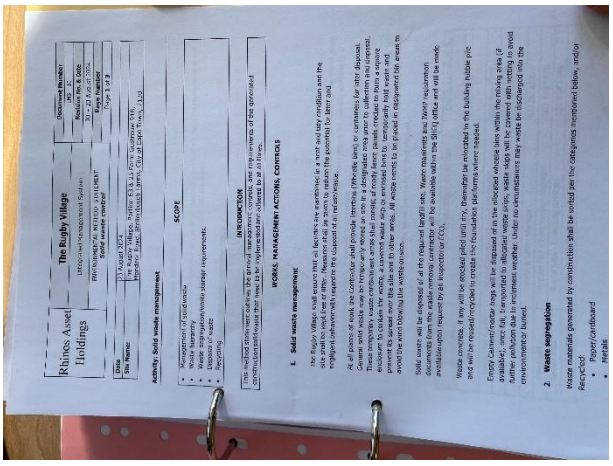


Method statement for Fire Control.

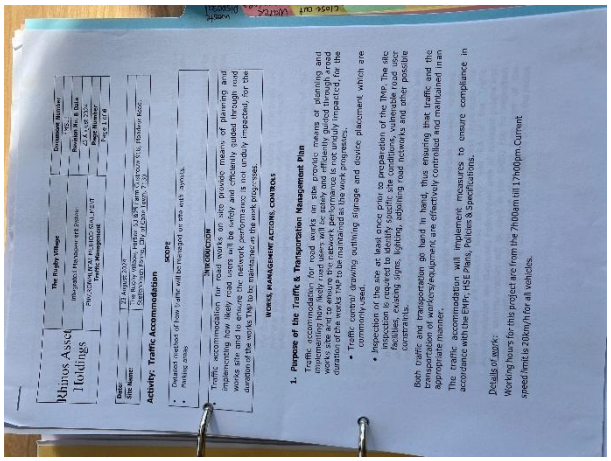
Emergency Assembly and Exit Points.



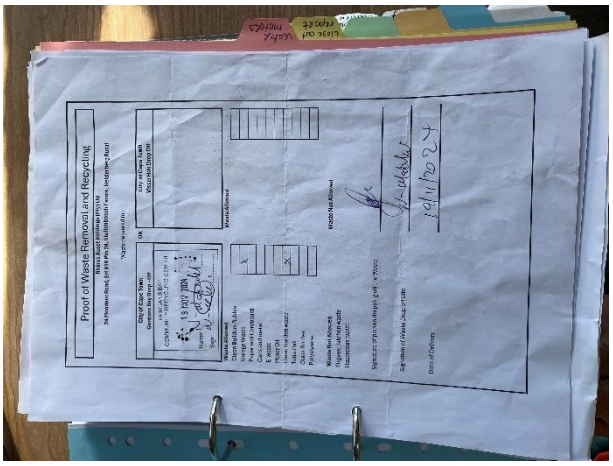
Method statement for Topsoil Management.



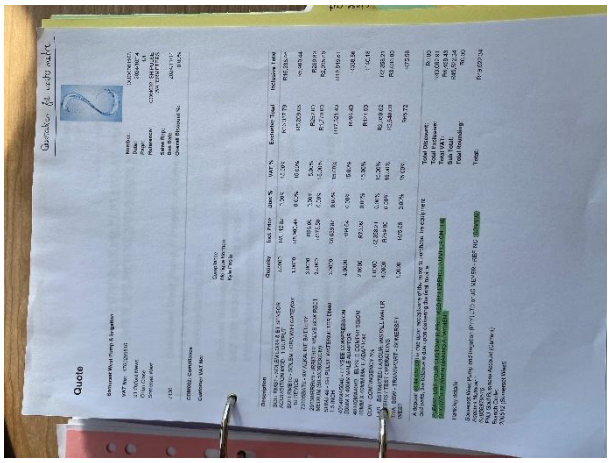
Method statement for Solid Waste Control.



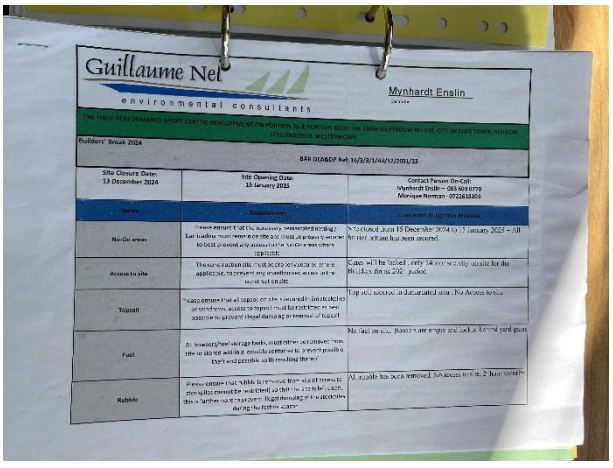
Method statement for Traffic Management.



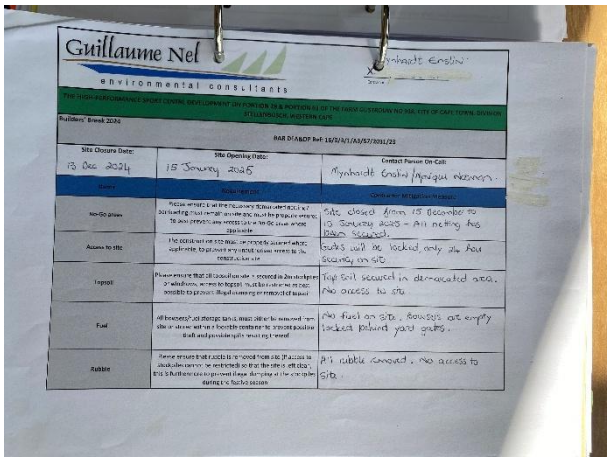
Waste Disposal Slips.



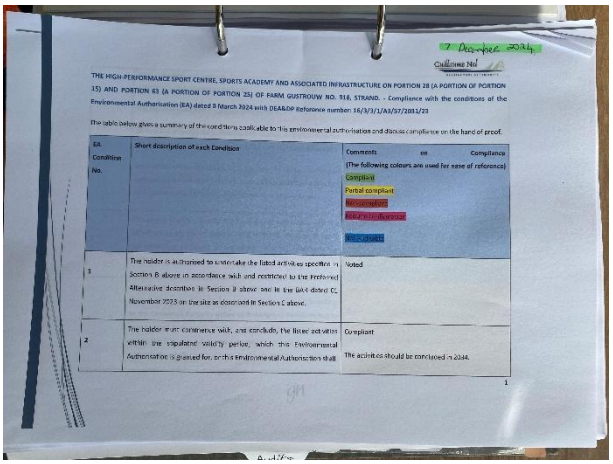
Quote for Water Monitoring System.



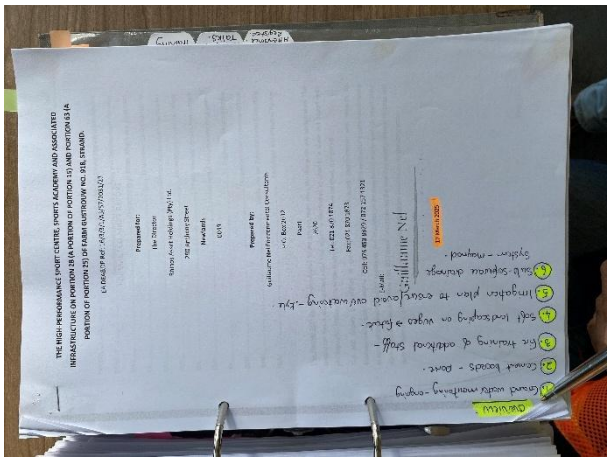
ECO report for 2024 temporary closure.



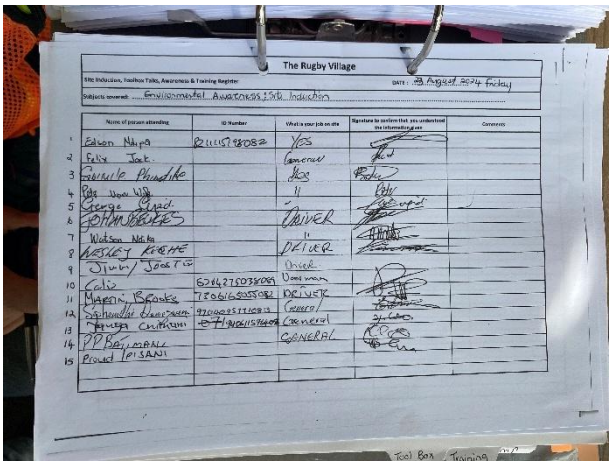
ECO report for 2024 temporary closure.



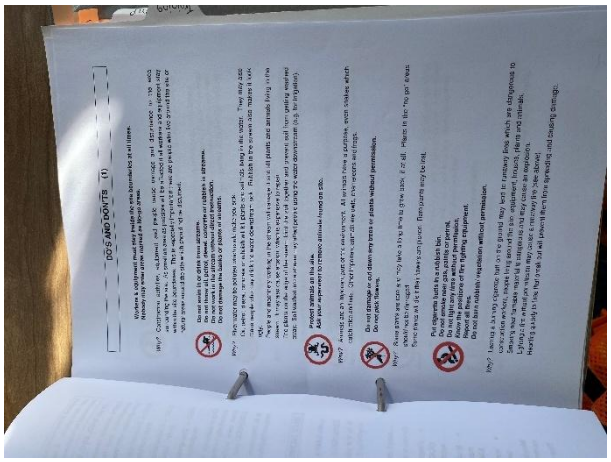
ECO EA compliance findings.



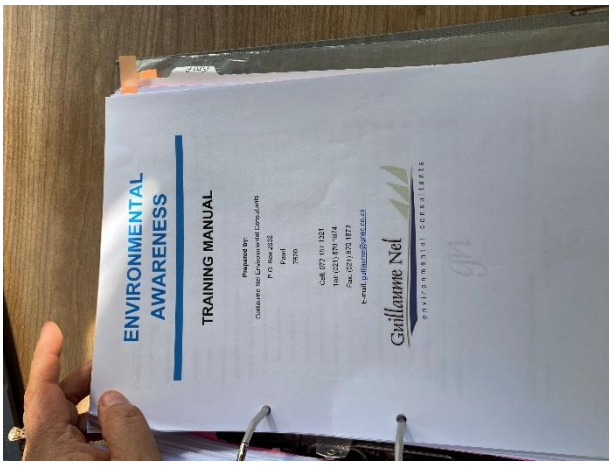
Monthly ECO reports.



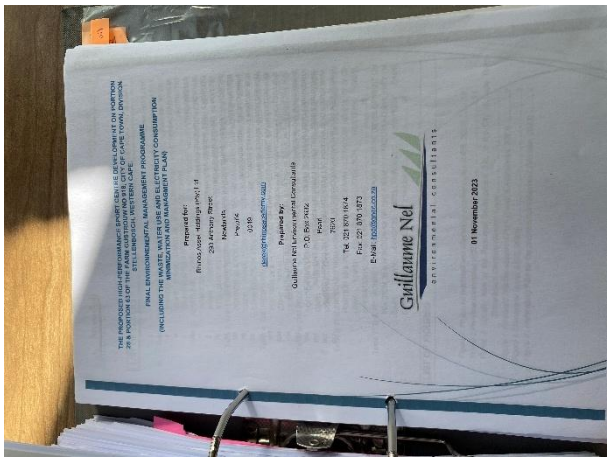
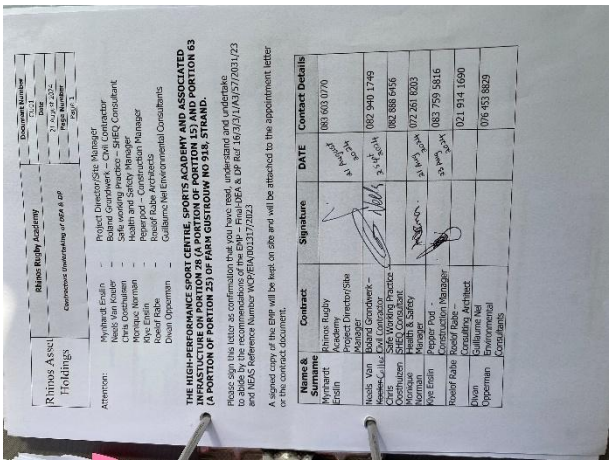
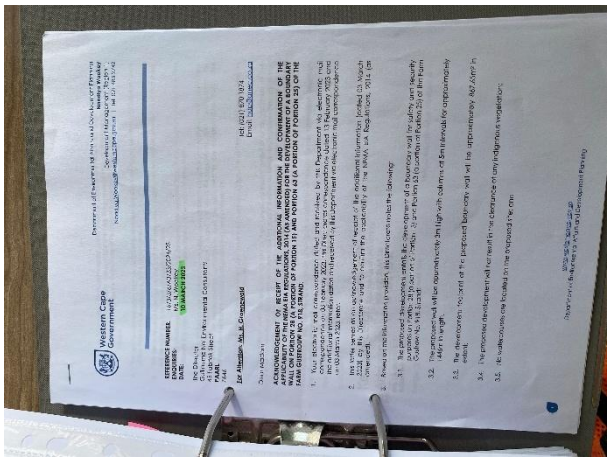
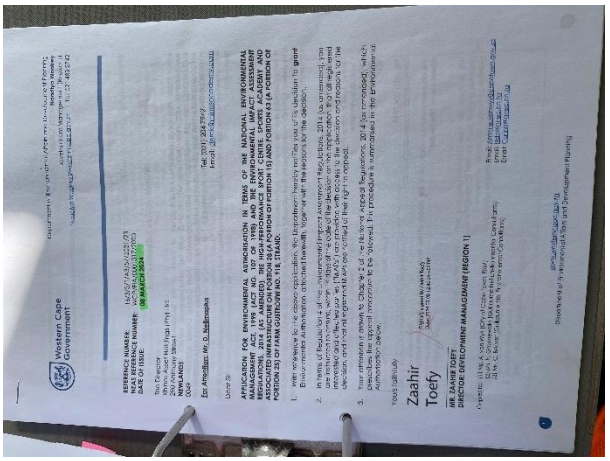
Environmental Site Induction Records.



Site Induction Notes.



Training Manual.

	
EMPr.	Contractors Signed Understanding of the EMPr.
	
Acknowledgement of receipt of additional information for the application submitted.	EA.