

**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.**

EA DEA&DP Ref: 16/3/3/1/A3/57/2031/23

FORMAL ECO AUDIT REPORT

Prepared for:

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17 April 2025



ABBREVIATIONS

BGCMA	Breede-Gouritz Catchment Management Agency
DEA&DP	Department of Environmental Affairs and Development Planning
DWS.....	Department of Water Affairs and Sanitation
EA	Environmental Authorization
EAP	Environmental Assessment Practitioner
ECO.....	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr.....	Environmental Management Programme
ER	Employer's representative
DEO	Designated Environmental Officer
GNEC	Guillaume Nel Environmental Consulting
I&AP	Interested and Affected Parties

INTRODUCTION

This Formal ECO Report is distributed to the project team after the site audit was undertaken. The contractor has 3 working days after this report is distributed to provide a close out report with photographic evidence of how the findings in this report were rectified, if required.

The ECO Report is compiled in order to ensure continuous improvement with regards to environmental related matters. The aim is furthermore, to increase the contractor's compliance rating in terms of the environmental approvals, and to advise on environmental matters which might occur during construction activities. This ECO report incorporates the monthly environmental findings and furthermore may include corrective measures/actions which were taken by the contractor.

CLOSE OUT ON FINDINGS REQUIRED

	Finding	Close Out Recommendation
3	EA Condition 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.	An External Environmental Audit must be done within 3 months of commencement, and as the construction phase commenced before the ECO was notified, the External Audit should be done as soon as possible. Quotes have been sent to the Client. This condition however will stay partial compliant as the timeframe is 6 months after commencement.

PROJECT DESCRIPTION

The authorised development entails the development of a high-performance sports centre 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. The proposed development will include the following components:

- A high-performance centre and associated infrastructure
 - A high-performance centre;
 - A sport medical centre (located adjacent to the high-performance centre);
 - A clubhouse (located along the eastern boundary of Field A);
 - Athlete accommodation (The accommodation will comprise of prefabricated living units/pods in two locations on the site. Each cluster will comprise of eight living pods (each double-storey in height) designed around a central courtyard. A cluster of four accommodation facilities will be located along the northern boundary of the proposed site and a cluster of three accommodation facilities located along the eastern boundary of the site. Each pod is designed to accommodate approximately 5 people, therefore approximately accommodating 280 persons at maximum capacity);
 - Training Fields (Field A will be located adjacent to the high-performance centre between Fields B and C. Field B is proposed to be located northeast of Field A. Field C is proposed to be located southwest of Field A. Floodlights approximately 15m in height is proposed around training Fields A, B and C.);
 - Two smaller grass training fields, a skills development workshop and associated administrative buildings and a parking area will be developed on Portion 63 (a portion of Portion 25) of Farm Gustrouw No. 918, Strand. A portion of the parking area will be covered parking and will contain solar photovoltaic panels for the generation of electricity; and
 - A 5m high pre-cast stepped barrier wall approximately 213 meters in length will be located along the eastern boundary of Portion 28 (a portion of Portion 15) of the Farm Gustrouw No. 918 for noise and visual breaks to mitigate against impacts on sensitive receptors located at Monkey Town. The development of the noise / visual break wall will be developed prior to the commencement of bulk earth works associated with the development of Field C and in accordance with the construction methodology (dated 18 October 2023).

Services

Wastewater Treatment

Existing capacity constraints at the Macassar Wastewater Treatment Works necessitate upgrades to be completed prior to the servicing of the proposed development. As an interim measure, an on-site package sewerage treatment package plant with a capacity of approximately 120kl/day will be developed adjacent to the parking area, equipped with an emergency overflow into the existing municipal system located in Mondeor Road. The emergency pipeline connection to the existing sewer line in Mondeor Road will require the development of a 160mm diameter pipeline.

The treated effluent will be discharged into an irrigation pond with a storage capacity of approximately 178m³ located on the southwest corner of the site from where treated effluent will be utilised for the irrigation of landscaped areas throughout the proposed development. The irrigation pond will comprise storage capacity of 48 hours. In the instance of excess treated effluent beyond irrigation and storage capacity, the treated effluent will undergo further polishing via a reedbed system prior to discharge into the regional stormwater attenuation facility to be developed, when required.

Stormwater

An on-site stormwater attenuation facility is proposed on the southwestern corner of the site in which site run-off will drain into via a piped stormwater network. The stormwater attenuation pond is proposed with a storage capacity of 2 145.0m³ with overflow connections into the proposed regional stormwater network. A connection into the local stormwater network will be made via two 600mm diameter pipelines proposed to be installed from the on-site stormwater attenuation facility and be routed within the road reserve of Mondeor / Dinsley Walk Roads and will link to the proposed 900mm diameter bulk stormwater pipeline main line feeding into the regional stormwater attenuation pond to be developed. The bulk stormwater pipeline will be approximately 1200m in length.

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A dry regional stormwater attenuation pond with depth of approximately 1.5m and a storage capacity of approximately 4 000m³ will be developed on Portion 206 of Farm Gustrouw No. 918, Strand.

Water supply

Potable water will be supplied by the local authority. However, two pipeline routes have been identified and the preferred route connection will be determined during the construction phase. A 200mm water main is proposed to be installed adjacent to Sir Lowry's Pass Road where the proposed development will connect into via a 160mm pipeline approximately 600m in length. The proposed pipeline route will be located from Sir Lowry's Pass Road in a southerly direction within an existing gravel road up to Mondeor Road reserve along the proposed site boundary. The alternative bulk water

pipeline route is along Mondeor Road, the N2 national road up to Onverwacht Road via a 160mm diameter pipeline. Connection into the existing 500mm water main located approximately 1 100meters from the proposed site in Onverwacht Road. The full water demand of the proposed development has been calculated as 98 488l/day with a peak water demand at 393 952l/day.

Electricity supply

Electricity has been confirmed and will be provided by Eskom via the Waterkloof 1 network with a total capacity of 700kVA.

Two access points will be established off Mondeor Road and an emergency exit will be located along Dinsley Walk Road on the western boundary of the site. Internal roads wider than 4m in width will be developed. Further road upgrades will be undertaken in accordance with the Traffic Impact Assessment (compiled by UDS and dated 03 April 2023).

The total development footprint proposed is approximately 8ha in extent.

FINDINGS IN TERMS OF THE APPROVED EMPR DURING THE SITE VISIT ON THE 7TH OF APRIL 2025

Requirement Please refer to approved EMPr for detailed requirements	ECO comments and/or recommendation	Compliance
		Compliant
		Partial-Compliant
		Non-Compliant
		Require Confirmation
		Premature
		Not Auditable
PRE-CONSTRUCTION (PLANNING) PHASE EMPr		
Visual Impact	<u>Lighting Mitigation Measures:</u> General Lighting: Keep light pollution to a minimum, limit lighting to safety/security needs, and ensure it is directed away from sensitive receptors (e.g., scenic routes, cultural landscapes, and neighboring properties). Lighting Specifications: Use lighting only when necessary, limit brightness, minimize blue light emissions, and ensure lighting is fully shielded and pointed downward.	Premature

	• Exterior Lighting: Install fixtures with directed illumination to reduce light spill, limit façade lighting to accents, and avoid extensive building lighting, especially on sensitive facades. • Security Lighting: Use motion-activated security lighting only, avoiding “always-on” floodlights. • LED Lighting: Use low-color-temperature LEDs (max 3000K) to minimize blue light, with dimming capabilities. • Floodlights: Ensure floodlights comply with local/international standards to control glare, backlight, and uplight. Use simulations to ensure minimal impact, particularly in relation to the Broadlands Cultural Landscape. <u>Outdoor Sports Facility Lighting:</u> • Practice vs. Event Lighting: Use dimmed lighting for practice sessions, and restrict lighting for events to rare occasions. • Shielding and Barriers: Shield lighting with the sports centre buildings, tree growth, and a 5m noise barrier to reduce impact on neighboring properties. • Field-Specific Requirements: Ensure lighting for fields meets specified lux levels (e.g., 342 lux for Field A) and minimize light spill and glare. • Operational Phase: Develop and submit procedural guidelines for controlling lighting during future planning phases, and ensure lighting spill outside the 10m perimeter meets acceptable levels. <u>Tree and Vegetation Management:</u>	Premature
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	• Retention and Protection: Retain and protect existing tree belts, windbreaks, and mature tree specimens as specified in the Tree Management Plan. Prepare tree protection guidelines for implementation during construction. • Tree Replacement: If any trees are damaged or removed, they should be replaced with appropriate specimens during the construction or operational phases. • Landscape Plan: Update and ensure that the Landscape Plan shows all retained trees, particularly those contributing to screening and the sense of place. Noise Barrier: • Visibility and Light Impact: The proposed 5m noise barrier will not be visible from sensitive receptors and will mitigate lighting impacts on neighboring residents. • Design: The wall design and finishes must align with the recommendations for appropriate materials and finishes to blend with the surroundings and minimize visual impact.	
Traffic Impact	Access to the site is gained from Mondeor Road and Dinsley Road and all City of Cape Town Road rules and signs applicable were being complied with by the contractors on site. The standards and guidelines to ensure access to Municipal Waste trucks should please be met.	Compliant

Project contract and programme	The contractor has supplied proof of the EMPr being included in the contract documents.	Compliant
	A copy of the EMPr is available at the site office. No surface water diversion is currently required as part of the construction works, it is important to note that works cannot only take place in the dry period due to the extent of the contact period stretching over multiple seasons. A dewatering plan has been submitted to the ECO, thank you for that.	Compliant
Site demarcation and development	The construction area has a wall all around. The declaration of understanding has been signed on the EMPr. The site is technically screened by the vibracrete wall around the site. Monthly groundwater quality monitoring is not done on site monthly according to the ECO. Quotes have been received for monitoring systems at the boreholes.	Partial Compliant
Emergencies, non-compliance and communication	Method statements were received and are placed in the environmental file at the site office.	Compliant
CONSTRUCTION PHASE EMPr		
Stockpiles	The stockpiles on site is easily accessible, the only stockpiles currently on site is the topsoil. The topsoil is currently being placed on site on the fields.	Compliant

Topsoil management	The topsoil should please be stockpiled or windrowed on site and seen as a no-go area.	Compliant
Oil and Chemicals	A method statement was observed for oil and chemicals on site. No hazardous materials were noted on site. A drip tray was placed underneath the bowser, thank you for that.  An oil spill kit was placed in the site camp.	Compliant
Cement	No batching was done during the audit, all cement remains were removed.	Compliant
Dangerous and toxic materials	No hazardous chemicals are placed on site.	Not auditable

Bulk storage of fuels and oils	A bowser was placed on site, a drip tray was placed underneath the bowser.	Compliant
Use of dangerous and toxic materials	Firefighting equipment and an oil spill kit was observed in the site camp of the contractor.	Compliant
	An incident reporting system has been setup on site and placed within the Safety Officer's file. Certain staff members should please receive fire training as per the EMPr. No spills had been recorded or reported on site.	Compliant
Eating areas and camp followers	An eating area was seen on site, thank you for that. A designated smoking area has been provided on site. No litter was seen in the site camp. A bin was placed on site.	Compliant

		
Toilets	Sufficient toilets were observed in the site camp.	Compliant
Waste management	Good waste management was observed during the audit. No rubble was seen on site.	Compliant
Dust	A dust control method statement was submitted to the ECO. No excessive dust was observed during the audit, as it was a calm day. Dust suppression is done on site when the dust becomes a problem on site.	Compliant
Workshop equipment, maintenance and storage	Ensure that senior and relevant staff are trained in cleaning up oil spillages using oil spill kits and provide evidence of training to the ECO and Auditor.	Compliant

	No spillages were observed in the site camp during the audit. An oil spill kit was observed within the site camp area	
Noise	No excessive noise was heard during the audit, and construction is only active during working hours. 1. Construction Timing: ○ Restrict all construction activities to daytime working hours to minimize noise impacts on surrounding areas. 2. Equipment Maintenance: ○ Ensure all mobile equipment, vehicles, and power generation equipment are regularly serviced and maintained to prevent unnecessary noise. ○ Conduct noise tests at the commencement of construction and periodically throughout the construction phase. 3. Noise Monitoring: ○ Regularly monitor noise levels at sensitive receptors around the construction site to ensure compliance with regulations. 4. Worker Training: ○ Train all construction staff on noise mitigation practices and the importance of minimizing noise during operations. 5. Effective Communication:	Compliant

	○ Maintain clear communication with neighboring properties regarding the construction schedule and any expected noise disruptions. Animal-Specific Mitigations • As no animal enclosures are on-site anymore, measures related to primate monitoring, noise barriers, or specialized consultants are no longer required.	
Crew camps	No staff is accommodated on site, the site camp was neat and tidy during the audit. No washing areas was constructed on site. The contractor's camp was neat and tidy.	Compliant
Fires	A method statement for Fires have been received to date and firefighting equipment was seen on site.	Compliant
Erosion and sedimentation	No major erosion runnels or sedimentation was observed at any of the working areas.	Compliant
Fauna	No fauna was observed during the audit, but a fauna awareness should be included in the environmental talks.	Compliant
Flora	The three Outeniqua yellowwood trees noted in the EMPr have not been found on the site and is on the neighbouring property, so no trees have been retained. Some palms and trees were transplanted on site.	Not auditable
Heritage	If archaeological artefacts or human remains are discovered during construction, work must stop immediately, and the ECO and Local Council must be notified within 24 hours.	Not auditable

	An archaeologist will examine the site, and no artefacts may be removed or disturbed without authorization from Heritage Western Cape or relevant heritage authorities.	
No Go Areas	No sensitive areas were identified on site.	Not auditable
Access Routes	Existing roads and services have been utilized to minimize the development's impact on natural habitats, with any necessary new access roads following existing routes as closely as possible under ECO supervision. Designated access roads, parking areas, and signage have been established, and security personnel are enforcing restrictions against unauthorized access and recreational activities such as quad biking and 4x4 usage.	Compliant
Crime, safety and security	No staff lives on site. All emergency procedures were in place as required by the EMPr. The ECO noted a list of emergency contacts displayed at the site camp area. As far as the ECO is aware the nearest emergency service provider has not been contacted by the contractor as yet to find out the capacity and magnitude of accidents it can handle.	Compliant
Visual Impact	<u>Landscaping Installation and Phasing:</u> - Trees fulfilling screening functions must be planted and irrigated during Phase 1 of construction. - Landscaping along public road verges and boundary edges must be implemented early in the construction process to reduce visual impacts.	Not auditable

	<u>Irrigation and Tree Maintenance:</u> • Ensure consistent irrigation supply to trees with a dedicated system and weekly watering (minimum of 40-50L per week). • Use soil conditioning and moisture retention products to improve tree growth and survival in sandy soils. <u>Boundary Walls and Public Interfaces:</u> • Enhance public road verges with soft landscaping to soften structures and contribute to the area's aesthetic quality. • Design walls and fences to be visually neutral and align with the local landscape character. <u>Ongoing Maintenance:</u> • All landscaped and revegetated areas must be regularly maintained to avoid becoming visual impacts themselves during both construction and operational phases. <u>Signage:</u> • All signage must comply with local bylaws to avoid unnecessary visual clutter. • Screenboards and signage should maintain a minimal visual footprint and not obstruct scenic views or impact sensitive receptors. <u>Parking:</u> • Implement physical barriers to prevent overflow parking outside demarcated areas.	
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	- Enhance screening of parking areas through landscaping to integrate them better into the surrounding environment. Construction Activities: - Position and screen temporary infrastructure to minimize visibility from sensitive receptors like the N2 scenic route. - Enforce safety, signage, and staff awareness protocols to reduce visual clutter and environmental degradation during construction.	
Hydrology	Since no construction activities are taking place in the watercourses, sediment control devices are currently not required. All future works in these areas will adhere strictly to the approved environmental guidelines, with ECO supervision ensuring compliance.	Premature
Soil	The topsoil was used on site. Single handling of the topsoil was done.	Compliant

	 No alien species were noted on the topsoil.	
Groundwater	Implement an appropriate subsurface drainage system for the sports fields to prevent water ponding due to clay in the soil profile. Develop an irrigation plan to avoid over-irrigation and ensure treated effluent does not contaminate groundwater. Effluent must meet the DWS general limit. Ensure that the package plant and associated infrastructure comply with relevant standards and are bunded to prevent contamination. Ensure that the water quality of effluent cycled through the package plant is treated to the DWS general limit. Before using groundwater for any construction-related activities, have the water quality analyzed by an accredited laboratory.	Note

OPERATIONAL PHASE EMPr		
Waste management	No waste will be generated by the use of the road and structures during the operational phase. All litter and rubble will be removed before the contractor leaves the site.	Not Auditable
Stormwater Management	Storm water, wherever possible, must be allowed to soak into the land in the area on which the water has been discharged. The storm water system and the discharge points must be inspected, and damaged areas must be repaired if required. Discharge points should further be inspected for blockages of any kind; these must be removed timeously to ensure the efficient operation of the storm water management system. No waste or refuse must be allowed to access the storm water infrastructure. In the event that silt runoff occurs off the development site, the cause of this must be investigated and suitable mitigation measures employed. This may include the vegetation of bare areas, installing flow diversion channels in consultation with an engineer, installing velocity reducing structures etc. For all maintenance undertaken reference must be made to recommendations in the engineer's reports and or the approved storm water management plan. All maintenance activities must be monitored to ensure that no environmental damage occurs. All damage must be mitigated immediately.	Premature

Dust	Surface dust should be minimized during the operational phase of the development in order to prevent the dust from being blown to adjacent properties.	Premature
Air pollution	All forms of dust/air pollution must be managed in terms of the Air Quality Act No. 39 of 2004 and Dust Regulations of 2013, this includes the control of noxious and offensive gases, smoke, dust and vehicular emissions. Under no circumstances may heavy smoke be released into the air.	Premature
Noise pollution	Noise levels shall be kept within acceptable limits, these are determined in terms of the relevant local by-laws. Operation activities will remain within normal working hours (07:00am – 18:00pm). Safetech noted that the results show that when the development is completed in 2028, a small amount of community complaints can be expected as per SANS 10103:2008, although this response may be offset due to the proximity of the site to the N2 road that has higher traffic volumes and thus higher noise levels. If complaints are received due to traffic noise, the local authority can then implement traffic calming measures that may decrease the road noise.	Premature
Primate Monitoring and mitigations	The initial cycles of monitoring can be done over a 24-hour period (for the noise impact), but not exceeding 14 days (for the effect of light), depending on the variables to measure as well as the availability of the equipment to be used. Since all the primates are diurnal, behavioural observations would be split into noise impact during the day and light impact at night. This can be done from the time the	Not auditable

	animals wake to going to sleep and from dusk until midnight and again between 02:00 and 04:00. The exact protocol would have to be developed in line with the objectives. THE PRIMATES HAVE BEEN REMOVED FROM MONKEYTOWN thus this condition is not auditable.	
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FINDINGS IN TERMS OF THE GRANTED ENVIRONMENTAL AUTHORISATION DURING THE SITE VISIT ON THE 7TH OF APRIL 2025

EA Condition No.	Description of each Condition	Comments on Compliance
		Compliant
		Partial-Compliant
		Non-Compliant
		Require Confirmation
		Premature
		Not Auditable
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
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	Compliant The activities should be concluded in 2034.

	commence with the authorised listed activities; and 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.	
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.	Compliant The Holder to take note of this condition.
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.	Partial Complaint The Holder of the EA notified the ECO that Field A has moved to the other side, which is a deviation from the approved Site Development Plan.
5	A minimum of seven (7) calendar days' notice, in writing, must be given to the Competent Authority before commencement of the development activity. The notice must make clear reference to the site details and EIA Reference number given above.	Non-Compliant The letter of commencement has been sent to the Department on the

	The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7, 10, and 21.1.	1st of July 2024. It was clear that construction has commenced in March 2024 and was stated by the contractor. However, the conditions noted in the EA were included in the letter of commencement.
6	The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision – 6.1.3 the date of the decision; and 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; 6.1.4 the date of issue of the decision;	Compliant The EA was issued on the 8th of March 2024, and the I&APs has been notified of the EA on the 11th of March, so within 3 days of the EA being 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 Appeal Regulations, 2014 (as amended); 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 name of the responsible person for this Environmental Authorisation, 6.4.3 postal address of the holder, 6.4.4 telephonic and fax details of the holder, 6.4.5 e-mail address, if any; 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	Non-Compliant

	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 the 11 th of March 2024, and the letter of commencement for site preparation was sent on the 1st of July 2024. It was however noted that construction has started without notifying the ECO somewhere in March. It is unsure if this condition is compliant.
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 EMPr is implemented on site.
9	The EMPr must be included in all relevant contract documentation for the applicable phases of implementation.	Compliant No contract documentation is available, thus the developer signed a letter to confirm 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.	Non-Compliant The ECO was appointed in June 2024, and the contractor mentioned that construction started in March 2024 already. Thus this condition is 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.	Compliant A copy of the EA, EMPr and ECO reports are kept on site in the file, thank you for that.
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.	Note
13	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	Non Compliant

	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). 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. 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. 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. 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.	The contractor stated that work has been done in March 2024, just after the EA was granted, so the External audit report should have been done in June 2024, but because the ECO was only appointed in June, the External audit should be done as soon as possible. Another audit should also then be done before March 2025. Which has also lapsed. Quotations were sent to the relevant parties and no confirmation of the audit has been received.
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	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.	
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
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.	Not auditable No heritage remains were noted on site.

16	The recommendations of the supplementary Heritage Impact 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.	Noted The Holder should take note of the Heritage recommendation, with regards to the fencing, lighting and landscaping.
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.	Noted
18	The following groundwater mitigation measures must be implemented: 18.1.1 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, <i>inter alia</i>, 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.	Compliant 18.1.1) The Holder is in process of installing monitoring of the groundwater and was supplied with quotes. 18.1.2) The boreholes have been placed on site, the locations of the boreholes have been sent to the ECO.

	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, <i>inter alia</i> , the installation of an 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.	18.1.3) Holder to comment on the installation of an 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: Holder advised that quotes have been received.
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.	Note The holder to take note of this condition.
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).	Not auditable No noise monitoring has been done on site to date as none of the chimpanzees of MonkeyTown is on site anymore, which was the purpose of the noise surveys.

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, <i>inter alia</i>, the following: 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). The implementation of the construction methodology (compiled by Swart and Associates Architects dated 18 October 2023) must be adhered to.	Not auditable No qualified person has been appointed prior to commencement as no chimpanzees are in the adjacent property anymore.
22	Dust suppression measures must be used to mitigate dust during the construction phase. No potable water must be used to mitigate dust nuisance. Alternative dust suppression methods (such as shade netting screens and/ or straw stabilisation, etc.) must be implemented instead.	Compliant Dust suppression is done on site in the summer months. Potable water is not used, borehole water is used for the dust suppression.
23	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	Compliant Employment has been given to the local community.

PROGRESS

The contractor was completed with the high field, and the middle field has been sown with grass seeds.



CONCLUSION

The major findings are the EA conditions not being complied with and the External Audit to be done.

Compiled by:



Nica Kotze

for GNEC

