

THE PROPOSED PERIODIC MAINTENANCE OF TRUNK ROAD 16/8 AND TRUNK ROAD 16/9 BETWEEN MURRAYSBURG AND THE NORTHERN CAPE BORDER.

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/C3/13/0015/23
NEAS REF. NO. WCP/EIA/0001305/2023



Prepared for:
The Head of Department
Western Cape Government:
Department Infrastructure
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KAPPEC

04 July 2025

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	04 July
Public Review Period	Not Applicable
Report Title	Proposed Periodic Maintenance of Trunk Road 16/8 and Trunk Road 16/9 between Murraysburg and the Northern Cape Border.
Applicant	The Head of Department Western Cape Government: Department Infrastructure Road Programme Management PO Box 2603 Cape Town 8000 Mr. Dirk Immelman Dirk.Immelman@westerncape.gov.za
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 The logo for KAPP Environmental Consultants features a stylized green leaf and blue water droplet icon to the left of the word 'KAPP' in large, bold, dark grey letters. Below 'KAPP' is the text 'ENVIRONMENTAL CONSULTANTS' in a smaller, all-caps, dark grey font.	

DISCLAIMER

This report has been prepared for the Department Western Cape Government: Department Infrastructure Road Programme Management and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC).

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

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

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

LETTER OF UNDERTAKING AND STATEMENT OF INDEPENDENCE

I Renier Kapp, as the appointed independent Environmental 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

04 July 2025

Date

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ABBREVIATIONS

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

APPENDICES

Appendix A:	Site Photographs
Appendix B:	Site Development Plan
Appendix C:	Copy of EA
Appendix D:	Copy of EMPr
Appendix E:	Maintenance Management Plan
Appendix F:	Commencement Notification and I&AP Database
Appendix G:	ECO reports
Appendix H:	Method Statements
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by the Department Western Cape Government: Department Infrastructure Road Programme Management (the Applicant) as the independent environmental assessment practitioners to undertake an external closure compliance audit in fulfilment of Condition 15 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to Department Infrastructure Road Programme Management on November 28, 2023 (DEA&DP EIA Ref: 16/3/3/1/C3/13/0015/23) in terms of the National Environmental Management Act, 1998 (Act 107 Of 1998) and The Environmental Impact Assessment Regulations, 2014.

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

The methodology followed for conducting the environmental audit included:

- Compilation of background information for the site visit
- Site Visit (April 2025)
- Documentation audit
- Compilation of environmental audit report
- Submission of external environmental audit report (04 July 2025)

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

TABLE 1: COMPLIANCE RATING

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

PROJECT DESCRIPTION

The Western Cape Government: The Department of Infrastructure is planning the routine maintenance of Trunk Road 16/8 (TR16/8) and Trunk Road 16/9 (TR16/9) between Murraysburg and the Northern Cape border. This maintenance will primarily occur within the existing road reserves, focusing on the sections from 43.48km to 48.12km of TR16/8 and 0.00km to 42.05km of TR16/9. The scope of work includes significant repairs to bridges and culvert structures, with attention to erosion control, hydraulic functioning, and concrete repairs.

On TR16/8, maintenance work will cover one bridge and five culvert structures, while TR16/9 will involve repairs on four bridges and approximately 60 culverts. Specific activities include;

- sealing exposed concrete,
- installing asphaltic plug joints,
- and conducting erosion protection at piers and embankments.

Concrete repairs will also be performed on balustrades and culvert structures, alongside the installation of new headwalls, wing walls, apron slabs, and erosion protection mechanisms at various points.

Additionally, due to the nature of the proposed work on Structure B4614 at km 26.94 of Trunk Road 16/9 over the Buffels River, a bypass road will be constructed upstream. This bypass, approximately 990 meters long and 6 meters wide, will temporarily redirect traffic while the bridge repairs are conducted. The road through the watercourse will span approximately 65 meters, with four 600mm diameter pipe culverts installed to allow water flow during the bypass operation.

The proposed maintenance will also involve works within watercourses, such as the removal of debris, vegetation, and sediment to ensure proper hydraulic functioning. The project will operate under a low-risk classification, provided that the bypass road is constructed and used for no more than six weeks during the drier months (April to July). The Department of Water and Sanitation has confirmed that a Water Use License is required, and the relevant application was submitted in October 2023.

This project aims to enhance the structural integrity of the bridges and culverts along these trunk roads, ensuring safety and improved functionality while minimizing environmental impact.

LISTED ACTIVITIES

The Amended EA subsequently authorised the applicant to undertake the underneath **listed activities**:

Environmental Impact Assessment Regulations Listing Notice 1 of 2014

Activity 12:

Activity Description:

The development of —

- (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or
- (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs—
 - (a) within a watercourse;
 - (b) in front of a development setback; or
 - (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;

excluding—

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

The proposal includes the development of a temporary bypass road in the Buffels River for the repair of Structure B4614. The temporary bypass is calculated to be 820m² within the watercourse. The total infilling required within the watercourse is ca. 800m³ material and will be removed once the bridge is operational again.

Activity 19:

Activity Description:

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

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

(a) will occur behind a development setback;

(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;

(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;

(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or

(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.

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

Activity 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 bypass road for Structure B4614 will require a new section of gravel road of ca. 100m in length and 6m wide to allow fluent alignment. The area earmarked for the section of road is located outside the urban area and contains indigenous vegetation.

Activity Number: 18:

The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.

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 bypass road for Structure B4614 will also entail the widening of an existing gravel road by 4m over a length of ca. 220m. The road is located outside the urban area and the sections where the widening will occur contain indigenous vegetation.

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.

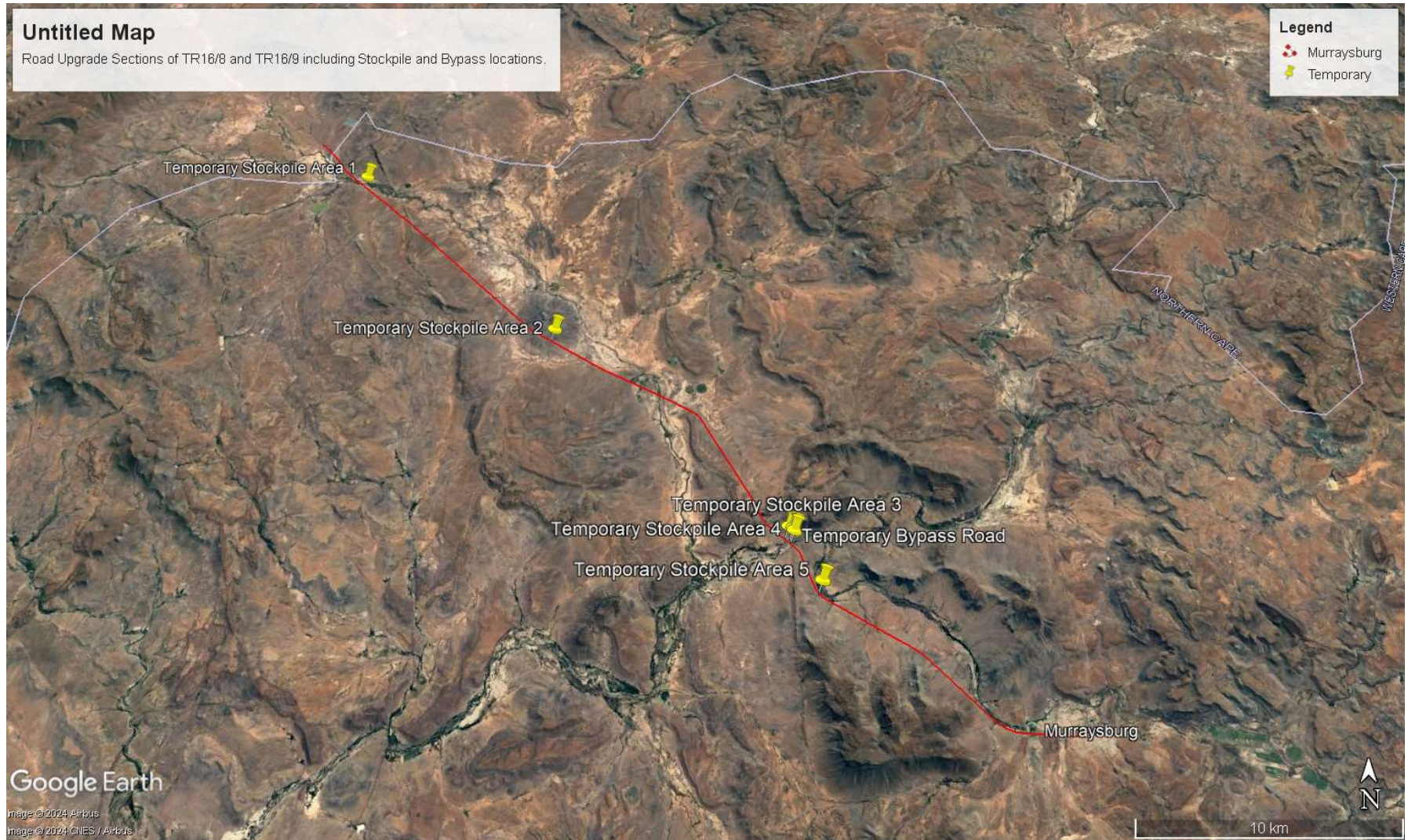


FIGURE 1: LOCALITY MAP OF PROPOSED ROAD SECTIONS

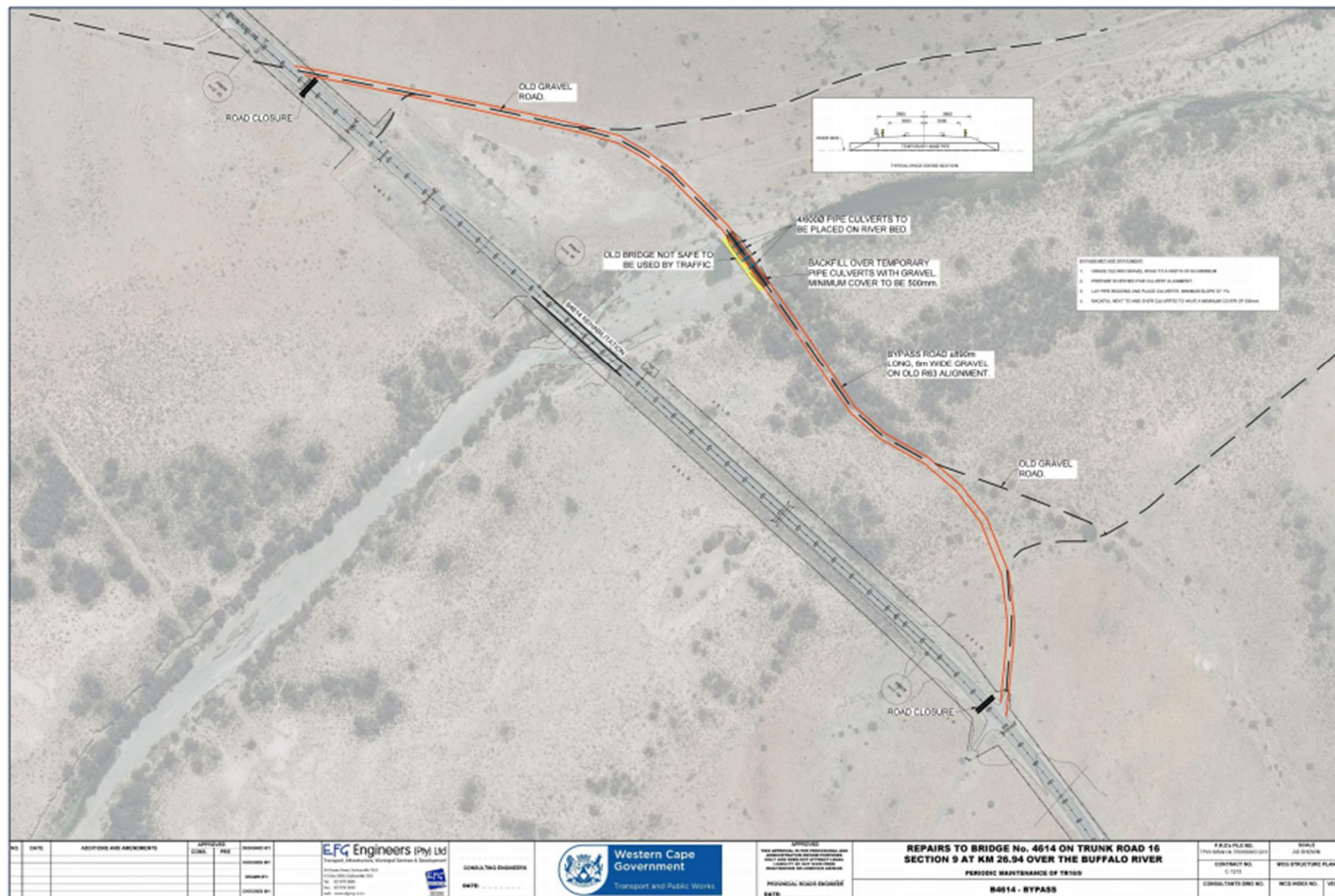


FIGURE 2: TEMPORARY BYPASS LAYOUT PLAN

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	This Environmental Authorisation is granted for the period from date of issue until 30 November 2028 (validity period), during which period the Holder must ensure that the — (a) physical implementation of all the authorised listed activities is started with and concluded; (b) construction monitoring and reporting requirements are undertaken and submitted to the Competent Authority in time to allow said authority to process such documents timeously; (c) post construction rehabilitation and monitoring requirements is undertaken and completed; and (d) environmental auditing requirements are complied with; and that such auditing is finalised in time to allow the competent authority to be able to process the environmental audits timeously within the specified validity period. Failing which, this Environmental Authorisation shall lapse, unless the environmental authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National	A letter to notify the department of the intended commencement of activities was submitted to the Department on the 10th of January 2024 notifying the department that the appointed contractor intends to commence maintenance activities from February 2024 onwards. Please refer to Appendix G for the ECO reports that were submitted to the competent authority. Please refer to Appendix G for the ECO reports that were submitted to the competent authority. All maintenance activities were concluded within March 2025, within the authorisation period. External audits were conducted as required and within the authorisation period to allow the competent authority to process the audits.

	Environmental Management Act, 1998 (Act no. 107 of 1998).	
2.	The Holder is authorised to undertake the listed activities specified in Section B above in respect of the preferred alternative described in the FBAR, dated 8 September 2023, on the site as described in Section C above.	The preferred alternative, as authorised, has been implemented on-site.
3.	This Environmental Authorisation may only be implemented in accordance with the approved Environmental Management Programme ("EMPr").	The EA was implemented in accordance with the approved EMPr.
4.	The Holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.	Noted, the holder holds all responsibility for the actions undertaken by anyone on site.
5.	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 have been obtained/approved. A non-substantive Part 1 amendment was granted on the 25th of September 2024 for the deletion of Section C: Condition 19 of the approved Environmental Authorisation dated 28 November 2023. This condition stated: "The proposed bypass road over the Buffels River required for the activities related to Structure B4614 must be constructed, operated, and removed during the dry season during late autumn to the end of the winter period (i.e., between April and July) to limit the impacts on the river." The reason for this amendment, according to the applicant, was that it was not feasible to develop the bypass road over the Buffels River during the specified dry season (April to July) in

		2024, due to above-average rainfall in the region during that period. This unexpected rainfall caused delays in the maintenance work on Structure B4614. The completion of the public road upgrade is contingent on the availability of funding from the WCG: Department of Infrastructure. Consulting engineers indicated that these delays are incurring significant costs, and further postponements would lead to exorbitant and unsustainable project expenses. Given the importance of public service and existing budget constraints, the project must be expedited.
6.	The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 6.1. notify all registered Interested and Affected Parties (“I&APs”) of – 6.1.1. the decision reached on the application; 6.1.2. the reasons for the decision as included in Annexure 3; 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 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; 6.4. provide the registered I&APs with the: 6.4.1. 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,	The I&AP Notification letter after the approval of the EA was sent on the 29th of November 2023 (1 day after the EA was granted).

6.4.4. telephonic and fax details of the Holder, 6.4.5. e-mail address, if any, of the Holder, 6.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended). 6.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the holder notifies the registered I&APs of this decision. 6.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided <i>i.e.</i>, the listed activities, including site preparation, must not commence until the appeal is decided.	
7. Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities on site. 7.1. The notice must make clear reference to the site details and EIA Reference number given above. 7.2. The notice must also include proof of compliance with the following conditions described herein: Condition no.: 6 and 10	A notification of commencement was sent to DEA&DP on the 10th of January 2024 and made clear reference to the site details and EIA Reference, it also included proof/comments of compliance with conditions 6 and 10. Please refer to proof of EA conditions below. Condition 6 – The I&AP Notification letter after the approval of the EA was sent on the 29th of November 2023 (1 day after the EA was granted). 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 the Department.

8.	Seven calendar days' notice, in writing, must be given to the Competent Authority on completion of the construction activities.	The ECO has notified DEA&DP of the completion of works on the 1 st of April 2025 and the final closure ECO report was submitted on the 11 th of April 2025.
9.	The Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is herewith approved . The EMPr must be included in all contract documentation for all phases of implementation.	The contractor was advised to please compile an environmental file with a copy of the EA, EMPr, ECO reports, waste disposal slips, induction registers etc. The file was available at the site office throughout the project period.
10.	The Holder must appoint a suitably experienced environmental control officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	Guillaume Nel Environmental Consultants was appointed as ECO on the site and submitted monthly reports to DEA&DP.
11.	The ECO must – 11.1. be appointed prior to commencement of any works (<i>i.e.</i>, removal and movement of soil and/or rubble or construction activities commencing; 11.2. ensure compliance with the EMPr and the conditions contained herein; 11.3. keep a record of all activities on the site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO; 11.4. remain employed until all development activities are concluded, and the post-construction rehabilitation and monitoring requirements are finalised.	Guillaume Nel Environmental Consultants was appointed as ECO on the site and submitted monthly reports to DEA&DP.
12.	The Holder may appoint a suitably experienced Site Agent or internally appointed Environmental Officer ("Internal EO") to assist the ECO with the tasks related to monitoring compliance with the Environmental Authorisation and EMPr.	A DEO has been appointed by the contractor to assist with monitoring on site.

	12.1. The appointment of such a Site Agent or Internal EO must be for the duration of the construction and rehabilitation phases of implementation contained herein.	
13.	A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and be made available to anyone on request, and where the Holder has website, such documents must be made available on such publicly accessible website.	The contractor was advised to please compile an environmental file with a copy of the EA, EMPr, ECO reports, waste disposal slips, induction registers etc. The file was available at the site office throughout the project timeline.
14.	Access to the site (referred to in Section C) must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	Access to the site referred to in Section C was granted, the environmental reports were presented to the Competent Authority who requested to see it.
15.	The Holder must, for the period during which the environmental authorisation; and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by the Department Western Cape Government: Department Infrastructure Road Programme Management (the Applicant) as the independent environmental assessment practitioners to undertake an external closure compliance audit in fulfilment of Condition 15 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).
16.	The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme:	An annual external audit must be undertaken by an independent environmental consultant. The proposal is to undertake 1x audit during construction works and 1x completion audit after the works have been completed.

	16.1. During the period which the activities have been commenced with on site until the post construction rehabilitation and monitoring requirements have been completed, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.; and 16.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within three (3) months of completion of the post construction rehabilitation and monitoring requirements.	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed by the Department Western Cape Government: Department Infrastructure Road Programme Management (the Applicant) as the independent environmental assessment practitioners to undertake the first external compliance audit in fulfilment of Condition 15 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended) in November 2024. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was once again appointed by the Department Western Cape Government: Department Infrastructure Road Programme Management (the Applicant) as the independent environmental assessment practitioners to undertake the final external compliance audit within the required 3 month post-construction and rehabilitation period.
17.	The Environmental Audit Report, must – 17.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process; 17.2. provide verifiable findings, in a structured and systematic manner, on– 17.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 17.2.2. the ability of the measures contained in the EMPr to	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by the Department Western Cape Government: Department Infrastructure Road Programme Management (the Applicant) as the independent environmental assessment practitioners to undertake an external closure compliance audit in fulfilment of Condition 16 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

	sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity. 17.3. identify and assess any new impacts and risks as a result of undertaking the activity; 17.4. evaluate the effectiveness of the EMPr; 17.5. identify shortcomings in the EMPr; 17.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 17.7. indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation; 17.8. indicate the date on which the operational phase was commenced with and the progress of the rehabilitation; 17.9. include a photographic record of the site applicable to the audit; and 17.10. be informed by the ECO reports.	
18.	The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).	The I&AP's will be notified within 7 calendar days after the submission of the final audit report to the Competent Authority.
19.	The proposed bypass road over the Buffels River required for the activities related to Structure B4614 must be constructed, operated and removed during the dry season during late autumn to the end of the winter period (i.e. between April and July) to limit the impacts on the river.	The bypass has been successfully constructed within the amended time frame (please refer to Appendix I for the Part I Amendment).
20.	The No-Go areas must be physically and clearly demarcated prior to	The contractor was made aware of the No-Go areas within the

	any earthworks commencing. This area may not be used to store any materials. All construction related activities such as materials storage and site camp establishment must occur within an identified area approved by the ECO.	large watercourses. The stockpile areas were all pre-approved by the ECO and were not located within any sensitive areas. All construction and maintenance activities were completed by the time of the audit. During the site inspection, all stockpile areas had been cleared, and no demarcation was deemed necessary.
21.	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority. Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.	No heritage remains were found throughout the project period.

SITE AUDIT FINDINGS

A final external audit was conducted on the 4th of April 2025 to assess the completion status of all post-construction and rehabilitation works. This site visit followed the previous audit and findings outlined earlier in the project cycle. At the time of this audit, **all construction, maintenance, and rehabilitation activities have been completed**, including the outstanding elements identified during the previous inspection.

Completed Works Since Previous Audit:

- **Buffalo River Bridge:**

The remaining works on the Buffalo River Bridge, including the replacement of joints and seals between bridge slabs, have been completed. The temporary bypass through the river has also been constructed and utilized during the works. All materials and equipment associated with this activity have been removed, and the area has been fully rehabilitated.

- **Stockpile Areas (SP 3 and SP 4):**

Stockpiles on both sides of the Buffalo River (SP 3 and SP 4) have been cleared. Topsoil that had been windrowed alongside the temporary road has been reinstated. The areas have been reshaped and stabilized, with no further need for demarcation. All five previously used stockpile areas have now been fully rehabilitated.

- **General Rehabilitation:**

All site camp infrastructure has been dismantled, and no equipment remains on-site. Vegetation has begun to naturally re-establish in cleared areas, and erosion control measures have been effectively implemented where necessary.

- **Culverts, Drainage Channels, and Gabion Structures:**

All previously identified works related to culvert cleaning, drainage channel clearance, and gabion reinforcement have been completed. No further maintenance or intervention is required.

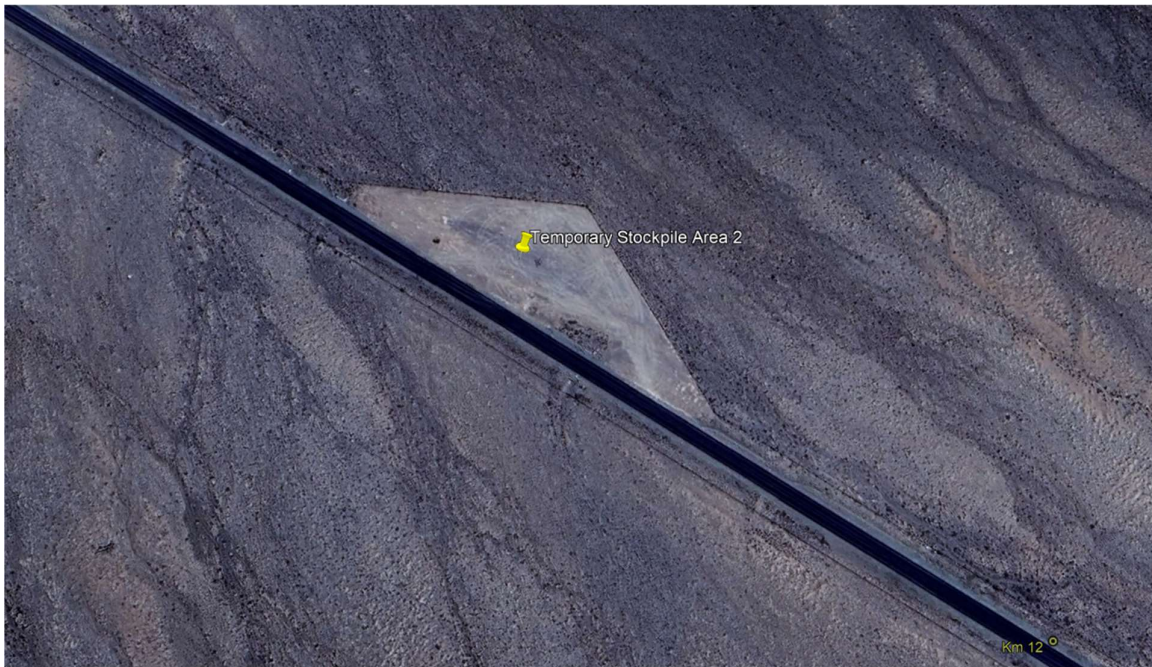
Based on the observations made during this final audit, the site has reached full compliance with post-construction and rehabilitation requirements. No outstanding works or environmental risks were identified during the visit.

Stockpile Areas

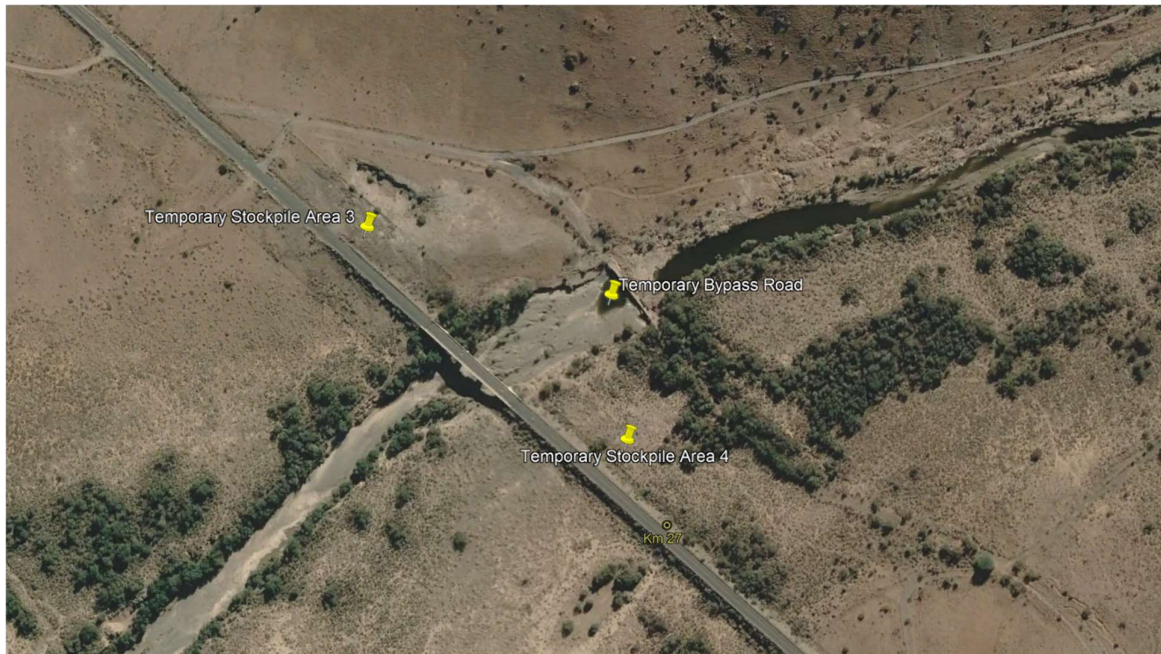
Stockpile Area 1 at approx. km 46.36 on TR16/8



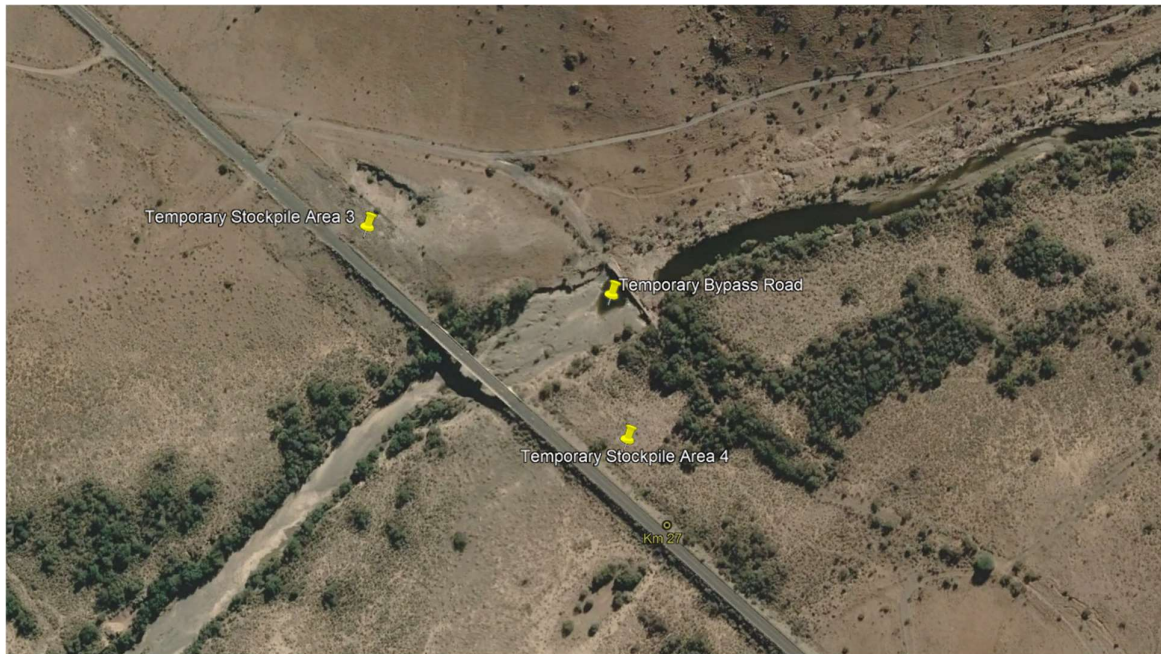
Stockpile Area 2 at approx. km 11.8 on TR16/9



Stockpile Area 3 at approx. km 26.60 on TR16/9



Stockpile Area 4 at approx. km 27 on TR16/9



Stockpile Area 5 at approx. km 29.34 on TR16/9



ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Environmental Induction All construction personnel must undergo environmental training, covering site-specific requirements and basic environmental ethics (e.g., litter prevention, and fire safety). Records should be kept of training (attendance register and content).	Environmental induction was given to all staff members before the commencement of any construction activities by the contractor as part of the toolbox talks.
2.	Demarcation of No-Go Areas	
2.1	The construction footprint, as defined in the Environmental Authorisation (EA), must be clearly identified and understood before contractors establish site camps or commence construction activities. Any disturbance outside the approved construction footprint is strictly prohibited.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. At the time of the audit, no active construction or site establishment was taking place, and as such, no demarcation was present or required. There were no signs of disturbance beyond the approved construction footprint, and all areas used during the project had been appropriately rehabilitated in accordance with the project's environmental requirements.
2.2	Stockpiled topsoil must be demarcated and seen as no-go areas.	During the final site closure audit, all five previously used stockpile areas were cleared and found to be in good condition. No construction materials, equipment, or residual waste were observed in any of the stockpile locations.
2.3	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 demarcation around areas not to be	The road resurfacing has been redone, and all surface work is now complete. Furthermore, all the culvert works and upgrades have been completed. It is evident from the site visit that the works and clearance did not exceed the boundaries of the development area

	disturbed.	which is confined to the road reserve. Some daylighting was required at a handful of culverts to ensure the flow of water and prevent damming.
2.4	These No-go areas must be demarcated with signs before any construction activities commence. The EO must be on site in order to make sure the correct areas are fully demarcated.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. At the time of the audit, no active construction or site establishment was taking place, and as such, no demarcation was present or required. There were no signs of disturbance beyond the approved construction footprint, and all areas used during the project had been appropriately rehabilitated in accordance with the project's environmental requirements.
2.5	The watercourses must be demarcated and marked as a 'no-go' area where no construction activities are planned.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. At the time of the audit, no active construction or site establishment was taking place, and as such, no demarcation was present or required. There were no signs of disturbance beyond the approved construction footprint, and all areas used during the project had been appropriately rehabilitated in accordance with the project's environmental requirements.
3.	Stockpiles and Site Camps	
3.1	All stockpiled material must be easily accessible on-site without any environmental damage of the surrounding properties. All temporarily stockpiled material must be stockpiled in such a way that the spread of materials is minimised.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. All five previously used stockpile areas were fully rehabilitated and found to be in good condition. No

	The stockpiles will only be placed within the demarcated areas, the location of which must be approved by the ER, the ECO must be consulted to scan areas prior to any clearance or usage of the area.	construction materials, equipment, or residual waste were observed in any of the stockpile locations.
3.2	In the case of strong wind and/or rain all stockpile 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), if deemed required by the Engineer, in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles. Stockpiles are to be stabilised if signs of erosion are visible.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. All five previously used stockpile areas were fully rehabilitated and found to be in good condition. No construction materials, equipment, or residual waste were observed in any of the stockpile locations. No erosion was noted during the audit as is evidenced in the photo pages.
3.3	Stockpiles may not exceed 2 metres in height and their footprint must be kept to a minimum. Stockpiling of removed materials will only be temporary and must be disposed of at a registered waste disposal facility.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. All five previously used stockpile areas were fully rehabilitated and found to be in good condition. No construction materials, equipment, or residual waste were observed in any of the stockpile locations.
4.	Erosion and Sedimentation	
4.1	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.	No erosion or sedimentation was observed during the final site audit.
4.2	In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. All five previously used stockpile areas were fully rehabilitated and found to be in good condition. No construction materials, equipment, or residual waste were observed in any of the stockpile locations. No erosion was noted during the audit as is evidenced in the photo pages.

5.	Flora and Fauna	
5.1	If any spills occur, they must be immediately cleaned up to avoid soil contamination that can hinder floral rehabilitation later down the line. Spill kits must be kept on-site within workshops. In the event of a breakdown, maintenance of vehicles must take place with care, and the recollection of spillage must be practised, preventing the ingress of hydrocarbons into the topsoil.	No spillage of chemicals was observed during the final site audit.
5.2	Upon completion of construction activities, it must be ensured that no bare areas remain, and that indigenous species be used to revegetate the disturbed area.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. Please refer to the photo pages as evidence of vegetation regrowth along the road reserve, stockpile areas and culvert.
5.3	Edge effects arising from the proposed maintenance, such as erosion and alien plant species proliferation, which may affect adjacent natural areas, need to be strictly managed. Specific mention in this regard is made of Category 1b AIP species (as listed in the NEMBA Alien species lists, 2022), in line with the NEMBA Alien and Invasive Species Regulations (2014); and Alien vegetation that is removed must not be allowed to lay on unprotected ground as seeds might disperse upon it. All cleared plant material to be disposed of at a licensed waste facility that complies with legal standards.	Alien clearing was continuous, and no alien infestation was observed during the site audit.
5.4	The relocation success of floral SCC (if found) must be monitored during the construction phase to ensure immediate actions can be taken if it becomes evident that relocation is not successful.	Noted, no relocation of SCC was required nor undertaken.
5.5	No collection of floral SCC or medicinal floral species must be allowed by construction personnel.	No collection of floral SCC or medicinal floral species was undertaken.
5.6	Edge effect control needs to be implemented to prevent further	All completed sections of the route have been maintained and only

	degradation and potential loss of floral and faunal SCC outside of the proposed development footprint area;	the road reserved was cleared along with drainage pathways towards the culverts.
5.7	No trapping or hunting of fauna whatsoever must be allowed.	Noted, no such occurrence was observed or mentioned.
5.8	Should the presence of any faunal SCC be noted, or their breeding sites be located within the development footprint, a suitably qualified specialist must be consulted on the best way to proceed.	Noted, no relocation of SCC was required nor undertaken.
5.9	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. 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.	Notes, all construction workers were made aware of this and no killing, hunting or trapping of animals has occurred.
6.	Method Statements The ECO will evaluate the method statement and ensure that it covers the handling of the following aspects: • Emergency spills procedures for the contamination of soils from spills • Handling & storage of oils and chemicals • Cement and concrete batching, which includes the location, storage, washing, & disposal of cement spills and rubble, packaging, tools, and plant • Diesel tanks and refuelling procedures • Construction lay down areas • Workshop maintenance and cleaning of plant • Topsoil management and handling (method of removal, location of stockpile areas, method of preserving)	Method statements were submitted by the contractor to the ECO. Method Statements included the following activities: • Bitumen Handling • Cement and Concrete Batching • Construction Lay Down Areas • Diesel Tanks and Refuelling Procedures • Dust Management • Emergency Spill Procedures and Soil Contamination • Handling & Storage of Oils and Chemicals • Topsoil Management and Handling • Rubble Management • Placement and Securing of Portable Toilets on Construction Site

	• Toilet placement and manner of securing toilets • Rubble management (including the location of stockpiling) • Litter management • Locations of spoil areas (if applicable) • Dust management • Bitumen handling	• Litter Management
7.	Topsoil Stripping	
7.1	Stockpiled topsoil must be regarded as no-go areas. No plant, workforce or any construction related activities will be allowed onto the stockpile topsoil.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. All five previously used stockpile areas were fully rehabilitated and found to be in good condition. No construction materials, equipment, or residual waste were observed in any of the stockpile locations. No erosion was noted during the audit as is evidenced in the photo pages.
7.2	Stockpiled topsoil must be monitored for invasive exotic vegetation growth. Contractors must remediate as and when required in consultation with the ER and ECO.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.
7.3	All topsoil must be replaced during the rehabilitation phase to ensure the re-establishment of natural vegetation.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded.
7.4	Handling of the topsoil must be minimised and must therefore only be handled before construction (to be stockpiled) and after construction (topsoil to be replaced).	Noted and complied with.
7.5	Topsoil stockpiles may not be higher than 2m.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.

7.6	The windrow of topsoil is preferred where no damage would be caused to the topsoil. This is to prevent carting topsoil to different areas on the site. Where windrow of topsoil is not possible (due to limited space or where topsoil might be damaged by construction works), the topsoil should be stockpiled in dedicated areas. It is important to note that record must be kept where topsoil was stripped and stockpiled to ensure the correct topsoil returns to where it was stripped.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.
8.	Dust	
8.1	<u>Potable water will not be used as a means of dust suppression,</u> 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.	All construction activities have been concluded, and no dust fallout was noted during the site audit.
8.2	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.)	All construction activities have been concluded, and no dust fallout was noted during the site audit.
8.3	At the end of construction, the site camp must be fully rehabilitated by removing the temporary surface, ripping the area to loosen the soil.	At the conclusion of construction activities, the site camp was fully rehabilitated in accordance with environmental requirements. The temporary surface was completely removed, and the area was ripped to loosen the soil and promote natural regeneration.
9.	Noise	
9.1	Noise reduction is critical, and contractors must minimize unnecessary noise, including loud talking, radios, motor revving, etc. Silent compressors are required, and machinery should be muffled where possible. All machinery and equipment must be well-	Noted, no noise complaints were received throughout the project period, and no machinery is currently in place on-site.

	maintained to prevent excess noise.	
9.2	Noisy activities are restricted to working hours, and residents and businesses nearby must be informed in writing 24 hours before unusually loud activities. Noise levels must not exceed 70dB above ambient noise.	All construction activities commenced within restricted working hours.
10.	Fires	No evidence of fires was observed during the site audit.
10.1	Absolutely no burning of waste is permitted.	
10.2	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.	No evidence of fires was observed during the site audit.
10.3	Fires in the designated areas must be small in scale so as to prevent excessive smoke being released into the atmosphere. Heavy smoke will not be released into the air.	No evidence of fires was observed during the site audit.
10.4	No felling of trees or wood collection is allowed from private or public property.	Some larger shrubs and small trees were felled within the road reserve to improve visibility.
10.5	The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.	Fire-fighting equipment was available where necessary during construction.
11.	Contractors Camp Site	
11.1	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.	Noted, the site camp has been dismantled, and all machinery has been removed from the site.
11.2	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.
11.3	No animals, domestic or otherwise are allowed on the premises.	No evidence of domestic animals was observed during the site

	The feeding, or leaving of food, for stray or other animals in the area is strictly prohibited.	audit.
11.4	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 as designated by the Beaufort West Local Municipality's solid waste removal department.	During the final site audit, the site was found to be in a neat and orderly condition, with no litter, construction rubble, or waste materials observed. All areas, including former work zones and access routes, had been properly cleared and maintained
11.5	Crew camps must be established outside of the delineated watercourse.	Noted and based on the ECO report, complied with.
11.6	The contractor's camp, offices and storage facilities shall be located within the site boundaries. If this is not feasible an alternative must be designated in consultation with the ECO.	Noted and based on the ECO report, complied with.
12.	Ablution Facilities	
12.1	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.	All construction activities have been concluded, therefore ablution facilities are no longer required.
12.2	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.	All construction activities have been concluded, therefore ablution facilities are no longer required.
12.3	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	All construction activities have been concluded, therefore ablution facilities are no longer required.

	be needed elsewhere, their location must first be approved by the ER, ECO.	
12.4	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.	All construction activities have been concluded, therefore ablution facilities are no longer required.
12.5	Toilets out on site must be secured to the ground and have a sufficient locking mechanism operational at all times.	All construction activities have been concluded, therefore ablution facilities are no longer required.
13.	Oil, Fuel and Chemical Storage	
13.1	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.	No fuel browsers or storage tanks have remained on site.
13.2	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.	During the site audit, the site camp has been dismantled, and all machinery has been removed from the site.
13.3	Any spills larger than 100l must 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). 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 large spills were noted or reported.
13.4	Materials such as fuel, oil, paint, herbicide and insecticides must be	No such materials were stored at the site during construction or

	sealed and stored in beamed areas or under lock and key, as appropriate, in well-ventilated areas.	were observed during the site audit.
13.5	Storage facilities must be bunded, roofed, secure, rain, wind and tamper proof.	No such materials were stored at the site during construction or were observed during the site audit.
13.6	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.	No such materials were stored at the site during construction or were observed during the site audit.
13.7	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.	No such materials were stored at the site during construction or were observed during the site audit.
13.8	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.	No surface or groundwater pollution was observed.
13.9	Empty containers shall be removed to a General & Hazardous Waste Landfill site.	No empty containers were observed during the final site audit.
13.10	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 storage tanks were observed.
13.11	Bulk fuel storage tanks shall be located in a portion of the construction camp where they do not pose a high risk in terms of water pollution. Bulk fuel storage must be covered during the rainy season (if practical).	No bulk fuel storage tanks were observed.
13.12	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 storage tanks were observed.
13.13	The contractor shall keep the necessary materials and equipment on site to deal with spills/fire of the materials present should they	All construction activities have been concluded, therefore spill kits are no longer required.

	occur.	
13.15	All staff must receive some form of fire training. Fire buckets and hoses shall be in good working order and easily accessible on site.	Noted and complied with regarding the Health and Safety requirements.
13.16	A record must be kept of all spills and the corrective action taken.	Noted and complied with, no significant spills were communicated to the ECO nor documented.
14.	Freshwater Management	
14.1	All maintenance footprint areas to remain as small as possible (preferably no more than 2-3 m in any direction from the maintenance site) and vegetation clearing to be limited to what is essential and may not extend beyond the road reserve.	Noted and complied with, based on the audit and the photographic evidence from the supplied ECO reports and site audit, the only vegetation that was cleared was within the road reserves, drainage pathways and culverts. The contractor was required to demarcate the works with wooden pegs within the larger riverbeds.
14.2	It is considered imperative that the proposed maintenance activities occur during the drier periods, to minimise any impact on the hydrological functioning of the watercourses.	Construction activities commenced in February 2024 and were completed near the end of February 2025. A non-substantive Part 1 amendment was granted on the 25th of September 2024 for the deletion of Section C: Condition 19 of the approved Environmental Authorisation dated 28 November 2023. This condition stated: "The proposed bypass road over the Buffels River required for the activities related to Structure B4614 must be constructed, operated, and removed during the dry season during late autumn to the end of the winter period (i.e., between April and July) to limit the impacts on the river." The reason for this amendment, according to the applicant, was that it was not feasible to develop the bypass road over the Buffels River during the specified dry season (April to July) in 2024, due to above-average rainfall in the region during that period. This unexpected rainfall caused delays in the maintenance work on

		Structure B4614. The completion of the public road upgrade is contingent on the availability of funding from the WCG: Department of Infrastructure. Consulting engineers indicated that these delays are incurring significant costs, and further postponements would lead to exorbitant and unsustainable project expenses. Given the importance of public service and existing budget constraints, the project must be expedited. It is now understood that conditions are favorable for the construction of the bypass, as recent lower rainfall levels have reduced the flow in the Buffels River. Additionally, the limited variation in median rainfall between summer and winter months suggests no significant increase in risk.
14.3	Areas where bank failure is observed must be immediately repaired.	No bank failures were observed during the audit nor communicated or documented during the construction period and ECO reports.
14.4	All alien invasive vegetation species, debris and litter removed from the crossings must be removed from site and properly disposed of (no stockpiling allowed).	No invasive alien plant infestations were observed during the final site audit, and the site remained clean and free of construction debris or litter.
14.5	Any sediment or silt removed from the watercourse will be temporarily stockpiled in the road reserve but outside the watercourse, for the duration of the day's work. These stockpiles will not exceed 2m in height, and their footprint must be kept to a minimum.	No erosion or siltation was observed during the site audit. No sediment and/or silt remains were noted along any of the culverts during the audit.
14.6	Stockpiling of removed materials will only be temporary (may only	All construction activities, including the completion of the bypass

	be stockpiled during the period of clearing at a certain crossing point) and must be disposed of at a registered waste disposal facility.	road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.
14.7	Only authorised maintenance personnel will be permitted to enter the watercourse as part of the clearing activities to prevent excessive compaction of the soil within the watercourse.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded.
14.8	It is preferred that no machinery be used as part of the clearing activities.	Complied with as per the ECO reports.
14.9	Contractor laydown areas and equipment storage are to remain outside of the 32m NEMA ZoR associated with the watercourses.	Complied with as per the placement of the contractor's camp, stockpile areas, per the ECO reports and site audit.
14.10	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 pollution of watercourses has resulted during the construction phase.
14.11	The contractor shall ensure that excessive quantities of sand, silt and silt-laden water do not enter the stormwater system.	No sedimentation was noted during the site audit.
15.	Soil Management	
15.1	Topsoil must be stripped from all areas that are to be utilized during the construction period and where permanent structures and access is required. These areas will include comprising the permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.
15.2	At the beginning of the construction phase, topsoil removed for vegetation clearance must be stripped to a minimum depth of 300 mm and windrowed.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.
15.3	The use of topsoil for rehabilitation contaminated by the seed of	No signs of alien vegetation infestation were observed in the

	alien vegetation must not be permitted unless a programme to germinate the seed and eradicate the seedlings is drawn up and approved, or some other mitigatory feature is found. This must be approved by the ECO. Single handling is recommended.	rehabilitated stockpile areas.
15.4	The soils surrounding the wingwalls and concrete aprons must be suitable loosened on completion of construction activities.	Complied with, refer to Appendix A for photographic evidence at the culverts.
15.5	Dust suppression is necessary for stockpiles older than a month – with either water or a biodegradable chemical binding agent.	All construction activities, including the completion of the bypass road and the rehabilitation of stockpile areas and road reserves, had been concluded. No stockpiles were present during the site audit.
15.6	Backfill will require contouring to ensure that it blends in with the surrounding environment.	Noted. Backfilling was carried out appropriately as part of the bypass road rehabilitation.
16.	Stormwater Management	
16.1	Stormwater, wherever possible, must be allowed to soak into the land in the area on which the water has been discharged.	Drainage pathways were maintained, and stormwater channels were cleared including the daylighting of these flow paths to allow for the effective distribution of stormwater into the discharge areas.
16.2	The stormwater system and the discharge points must be inspected, and damaged areas must be repaired if required. Discharge points must further be inspected for blockages of any kind; these must be removed timeously to ensure the efficient operation of the stormwater management system.	All upgraded culverts have been cleared of vegetation and other debris.
16.1	No waste or refuse must be allowed to access the stormwater infrastructure.	During the final site audit no waste or refuse was observed within the stormwater culverts.
16.2	In the event that silt runoff occurs off the development site, the	No sedimentation was noted during the site audit.

	cause of this must be investigated and suitable mitigation measures employed. This will include the vegetation of bare areas, installing flow diversion channels in consultation with an engineer, installing velocity reducing structures etc.	
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CONCLUSION

Based on the information obtained and a site visit conducted on the 4th of April 2025, the applicant has sufficiently complied with the conditions of the Environmental Authorisation and EMP. Furthermore, the EMP is considered adequate and effective to manage and mitigate the activities.

No specific contradictions between the EA and EMP were noted.

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

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

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

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

Compiled by:

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

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS

	
Northern end of the contract on the provincial border showing the upgraded road surface.	Culverts upgraded with new concrete structures, erosion control, and clearing of vegetation along TR 16/8.
	
Culverts upgraded with new concrete structures, erosion control, and clearing of vegetation along TR 16/8.	Culverts upgraded with new concrete stone pitch structures, , and clearing of vegetation along TR 16/8.
	
Culverts upgraded with new concrete stone pitch structures, and clearing of vegetation along TR 16/8.	Culverts upgraded with new concrete stone pitch structures, and clearing of vegetation along TR 16/8.



Condition of the completed road surface and road reserve along the TR 16/8.



Condition of the completed road surface and road reserve along the TR 16/8 along with the guardrailings.



Condition of the completed road surface and road reserve along the TR 16/8.



Condition of the completed road surface and road reserve along the TR 16/8.



Upgraded culvert on TR 16/8 with repaired concrete and stone-pitching, daylighting and vegetation clearance.



Condition of vegetation surrounding the upgraded culverts.



Culvert upgrading includes repaired concrete structures, stone-pitching, erosion control, and vegetation clearing.



Newly installed guardrails at B4611 on TR16/8 at Km 46.11 (Gabriel Stream).



Newly installed guardrails at B4611: TR16/8 at Km 46.11 (Gabriel Stream).



Bridge deck resealed, joints installed, with concrete and pier repairs. Condition of riverbed with spills removed.



Condition of Gabriel Riverbed with newly installed wire fencing for debris.



Condition of Gabriel River with newly installed wire fencing for debris.



Bridge deck resealed, joints installed, with concrete and pier repairs.



Bridge deck resealed, joints installed, with concrete and pier repairs.



Condition of the road reserve on TR 16/9.



Culvert upgrading includes repaired concrete structures, stone-pitching, erosion control, and vegetation clearing.



Culvert upgrading includes repaired concrete structures, stone-pitching, erosion control, and vegetation clearing.



Condition of the road surface on TR 16/9.



Condition of the road reserve along the TR 16/9 as seen towards the northwest.



Culvert upgrading includes repaired concrete structures, stone-pitching, erosion control, and vegetation clearing.



Culvert upgrading includes repaired concrete structures, stone-pitching, erosion control, and vegetation clearing.



Condition of the road surface and road reserve along the TR 16/9 as seen towards the southeast.



Culvert upgrading includes repaired concrete structures, stone-pitching, erosion control, and vegetation clearing.



Condition of the road surface and the road reserve along the TR 16/9 as seen towards the southeast.



Condition of the new road surface and newly installed guardrails at Km17.36 along the TR 16/9.



Condition of the new road surface and newly installed guardrails at Brakvallei River Bridge at Km 17.45.



Condition of the new road surface and newly installed guardrails at Brakvallei River Bridge at Km 17.45.



Concrete repairs and erosion protection works (gabion reinforcements) at piers and embankments.



Concrete repairs and erosion protection works (gabion reinforcements) at piers and embankments.



Concrete repairs and erosion protection works (gabion reinforcements) at piers and embankments.



Condition of the completed Brakvallei River brige road surface as seen towards the northwest.



Condition of the completed Brakvallei River brige road surface as seen towards the northwest.



Upstream condition of the Brakvallei River bridge.



Downstream condition of the Brakvallei River bridge..



Current condition upstream of the old Buffalo River and the rehabilitated temporary bypass at Km 26.94.



The old bridge upstream of the Buffalo River bridge as seen from the northern river bank towards the northeast.



Upstream of the Buffalo River bridge where the temporary bypass road was in place.



Upstream of the Buffalo River bridge as seen from the northern river bank to the southwest.



The rehabilitated temporary bypass upstream of the Buffalo River as seen from the southern bank



The rehabilitated temporary bypass along the southern bank of the Buffalo River as seen towards the southeast.



Condition of the Buffalo Bridge.



Condition downstream of the Buffalo Bridge.



From the Buffalo River bridge seen downstream towards the southwest.



From the Buffalo River bridge seen upstream towards the northeast.



Culverts upgraded with new concrete structures, erosion control, and clearing of vegetation.



Culverts upgraded with new concrete structures, erosion control, and clearing of vegetation.



Culverts upgraded with new concrete structures, erosion control, and clearing of vegetation.



Newly installed gabion baskets for sediment within the road reserve at approximately Km 34.6 on TR 16/9.



Newly installed gabion baskets for sediment within the road reserve at approximately Km 34.6 on TR 16/9.



Condition of the Uitkyk Bridge.



Newly upgraded culvert at the Uitkyk stream on TR 16/9.



Culverts upgraded with new concrete structures, erosion control, and clearing of vegetation.