

**ESTABLISHMENT OF A RESIDENTIAL DEVELOPMENT ON ERF 8892, FIRWOODS,
PAARL, WESTERN CAPE**

DEA&DP Ref: 16/3/3/1/B3/28/1032/22

FORMAL ECO AUDIT REPORT

Prepared for:

Bello Campo (Pty) Ltd

P.O. Box 43

Somerset Mall

7137

Prepared by:

Guillaume Nel Development Consultants

P.O. Box 2632

Paarl

7620

Tel: 021 870 1874

Fax: 021 870 1873

Cell: 076 453 8829 / 072 157 1321

E-Mail: divan@gnec.co.za / guillaume@gnec.co.za



08 August 2025



ABBREVIATIONS

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 Consultants
I&AP	Interested and Affected Parties

INTRODUCTION

This Environmental Control Officer (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

No.1	Findings	Close out Recommendations
1.	Regulation 34 Audit outstanding	An external auditor has been appointed and will visit the site in the coming week.
2.	The preparation of a Site Development Plan, Landscape Plan and Building Plans for the historical werf heritage precinct. These must be prepared by an architect and a landscape architect with significant experience in farm werf contexts of similar heritage value, and must be submitted to HWC for approval, notwithstanding the provisions of Section 34 of the NHRA.	The required plans are being drawn up. The holder of the EA has been in communication with a heritage consultant for the submission of needed documents.

PROJECT DESCRIPTION

Firwoods (Erf 8892, Paarl), is located in Southern Paarl, South of the N1 and gains access from New Eskdale Street in the North. The farm is bordered to the south by the Berg River that flows in a South to North direction, where after Boschenmeer Golf Estate is found. A small light industrial area (storage units and similar) borders the farm to the West where after the De Zoete Inval residential area is found. The Southern border of the farm is a continuation of the agricultural activities that are currently active on site. The entire property is currently cultivated with different crops (vineyards and fruit trees). A manor house and A storage shed is located in the centre of the farm, and approximately 10 labourer dwellings are located along the Northern border.

The developer intends to retain the agricultural look and feel of the farm. The development proposal includes various residential typologies of decreasing densities going eastwards, from residential units and residential apartments to single residential to gentlemen's estates bordering the agricultural portion which will remain (approximately 50% of the site will remain agricultural).

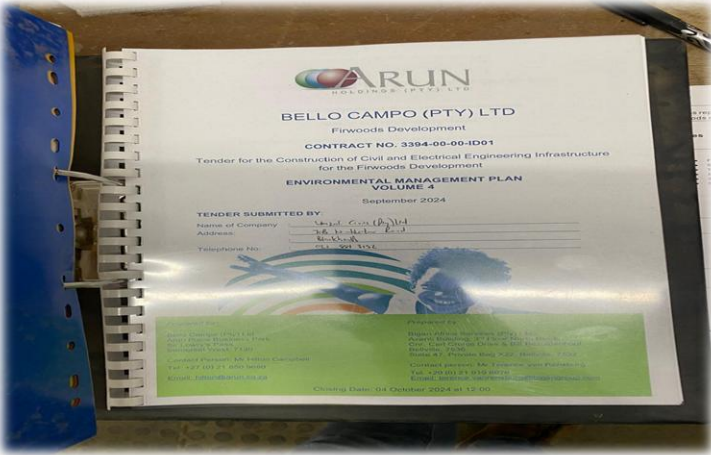
The proposed development will comprise of the following:

- 14 Gentleman's Estate with erf sizes ranging between approximately 4 000 m² and 4 513 m².
- 47 Dwelling Houses with erf sizes ranging between approximately 704 m² to 1019 m².
- 79 Townhouses with erf sizes ranging between approximately 247 m² to 447 m².
- 219 Apartments (approximately 81.4 units per hectare).
- The Existing Firwoods Homestead of approximately 1.47 hectares.
- An Open Space Zone of approximately 1.99 hectares.
- A Private Road of approximately 3.45 hectares.
- A Transport Zone of approximately 0.41 hectares.
- An Agriculture Zone of approximately 37.78 hectares.
- The construction of footpaths along the Berg River.

An Environmental Authorisation with reference (16/3/3/1/B3/28/1032/22) is in place for the development on Erf 8892 which was granted on the 02nd of December 2022. The works taking place within the property boundaries is done in terms of the EA and EMP.

FINDINGS IN TERMS OF THE APPROVED EMPR DURING THE SITE VISIT ON 16THTH OF JULY 2025

Requirement	ECO comments and/or recommendation	Compliance
Please refer to approved EMPr for detailed requirements		Compliant
		Partial-Complint
		Non-Compliant
		Require Confirmation
		Premature
		Not Auditable
CONSTRUCTION PHASE EMPr		
Traffic Impact	The contractor takes note to comply with Drakenstein Municipality Road rules.	Compliant
Project contract and programme	The EMPr has been included in the contract documentation and was available on site in the environmental file.	Compliant

		
Site demarcation and development	The project area and construction footprint are set out according to the Environmental Authorisation. The construction site is clearly demarcated with existing fencing and contained within the footprint of the property boundaries.	Compliant
Emergencies, non-compliance and communication.	All required method statements have been compiled and circulated to the ECO. No emergencies have been reported to date of this audit. An emergency spill response kit is located on-site.	Compliant
Stormwater	The Stormwater management plan was submitted to Drakenstein Municipality and was subsequently approved. The holder takes note that their stormwater strategy and	Compliant

	management must be in line with the policies of Drakenstein Municipality. Construction of Stormwater management Infrastructure has not yet commenced on site. Stormwater management on site is deemed sufficient. Holder takes note of the design criteria provided by the freshwater ecologist in regard to proposed flood line alterations. Alterations to the flood lines have not yet commenced.	
Visual Impact	Lighting at the site camp is not envisioned to have a visual impact as the camp is isolated on a Farm outside of residential areas.	Compliant
Stockpiles	Temporary stockpiled material is stockpiled in such as way to minimize the spread of materials. Soil stockpiles are within the demarcated construction footprint. Plant material, topsoil and sub-soil is stockpiled and windrowed separately to avoid contamination. Topsoil is stockpiled throughout the site and is demarcated.	Compliant
Oil and chemicals	Method statements for oil and chemicals have been provided to the ECO. Oils and chemicals are stored neatly in a containerised storage area in the site camp.	Compliant

	No spills have been reported to date.	
Cement	Method statements for cement batching have been provided to the ECO. Cement batching was active during the time of the audit and was sufficiently done in a wheelbarrow. No concrete spills and/or remains were noted during the audit.	Compliant
Dangerous and toxic materials Provision of storage facilities	Dangerous and toxic materials are sufficiently stored in a weatherproof containerised storage area at the site camp. Appropriate signage was noted at the storage area. Material safety data sheets are kept on-site on file. 	Compliant

Bulk storage of fuels and oils	A Method statement for the Diesel Tanks and Refuelling procedures were provided to the ECO. No Diesel and/ or petrol storage are located on site, vehicles are refuelled through a company bowser that is driven to and from the site. No bulk fuel storage was noted on-site.	Compliant
Use of dangerous and toxic materials	An emergency spill kit is located onsite. The procedure for dealing with spills/ fire is provided in the method statement supplied to the ECO and shall be adhered to. All staff on-site have received fire training. No spills or fire incidents have been recorded to date.	Compliant
Eating areas and camp followers	Method statements for crew camps and construction laydown areas. The employees are provided with sheltered eating areas and are neat and hygienic.	Compliant
Toilets and ablution facilities	Ablution facilities were provided for the employees at the site camp area and both the working area in the form of portable chemical toilets. The toilets were within 150m of the working area.	Compliant

	The contractor will ensure that the toilets are cleaned and emptied before builders break and other public holidays  	
Waste management	The site was neat and tidy during the time of the audit.	Compliant

Waste is properly managed on-site. A waste storage site was located within the site camp area and the construction site is neat and tidy.

No litter was noted during the audit. The contractor noted that a sub-contractor on site sorts through litter produced on site for recycling purposes. Litter is screened before removal.

Waste disposal slips should please be kept on file at the site and forwarded to the ECO. No significant amount of construction rubble has been produced on the site thus; no waste disposal slips are available at this point.

Rubble found during excavation is stored on site until it can be crushed and used for fill material.



Memorandum of understanding for the waste minimization plan has been signed.

Dust	A method statement for dust management was provided to the ECO by the contractor. Dust suppression was active during the time of the audit through the means of a water truck spraying non-potable water on roads and bare soil areas. Dust was not noted to be a problem during the audit, due to the recent periods of rain.	Compliant
Workshop equipment, maintenance and storage	The Contractor supplied the ECO with method statements for the workshop equipment, maintenance and storage. The contractor takes note that washing of equipment and vehicles should be done off-site as far as possible An Occupational Health and Safety Officer was appointed to audit the site in terms of Occupational Health and Safety Act, 1993 (Act No. 85 of 1993).	Compliant
Noise	Construction vehicles were in good working order during the time of the audit. The contractor takes note that the designated working hours should be strictly adhered to. Noisy activities shall take place only during working hours. The EO must inform the residents of houses and businesses adjacent to the development in writing 24 hours prior to any planned	Compliant

	activities that will be unusually noisy or any other activities that could reasonably have an impact on the adjacent sites.	
Crew camps	No accommodation is provided to the workers on site. No dedicated wash areas are located to surface sources. The contractors site camp is located within the boundaries of the site. Dust suppression is applied in the site camp area through the means of a water truck spraying bare surfaces. The site camp area was neat and tidy during the time of the audit.	Compliant
Fires	Fire management is provided in the supplied method statements. The contractor takes note that no waste is to be burned on site. The contractor takes note that fires in the site camp will only be allowed in specifically designed structures that serve this purpose. The contractor takes note that no felling of trees or wood collection is allowed from private or public property. Appropriate fire-fighting equipment is available on-site. The contractor has received a burning permit from Winelands Fire Protection Association and Cape Winelands District Municipality.	Compliant
Erosion and sedimentation	Disturbance of the site is kept to a minimum by only working in the necessary areas.	Compliant

	No major erosion or sedimentation was observed in the working areas. All storm water is managed effectively as to not enter the Berg River downgradient of the site. 	
Fauna	The contractor takes note that all workers must be informed that no intentional killing of animals is permitted. No fauna was observed during the audit.	Compliant
Flora	The contractor takes note that no open fires on site will be allowed. Fires will only be allowed in adequate facilities within the site camp area. The contractor has received a burning permit from Winelands Fire Protection Association and Cape Winelands District Municipality. The contractor has removed the vineyard stocks and will be burned when the optimal weather conditions arise.	Compliant

Heritage	In terms of the National Heritage Act, 1999 (Act No. 25 of 1999), should any archaeological artefacts be exposed during construction activities, work on the area where the artefacts were found shall cease immediately and the ECO as well as the Local Council shall be notified within 24 hours. The preparation of a Site Development Plan, Landscape Plan and Building Plans for the historical werf heritage precinct. These must be prepared by an architect and a landscape architect with significant experience in farm werf contexts of similar heritage value, and must be submitted to HWC for approval, notwithstanding the provisions of Section 34 of the NHRA. Any rezoning approval of the historical werf must not proceed until the necessary HWC approval has been issued. The abovementioned Site Development Plan and Landscape Plan must include the agricultural forecourt including the entrance gateway, the riverine view corridor, and the interface (boundary treatments and buildings) between the transition zones and the agricultural forecourt and the historical werf. These proposals must be submitted to HWC for approval. Any archaeological sites exposed during demolition or construction activities must not be disturbed prior to authorisation by the Heritage Western Cape and/or the South	Partial compliant The Site Development Plan, Landscape Plan and Building Plans for the historical werf heritage precinct have to be submitted to Heritage Western Cape for approval. The holder of the EA has been in discussions with a Heritage consultant regarding the submission of documents. The referred plans are in process of being drawn up.
------------------------	---	--

	African Heritage Resources Agency or the appropriate provincial heritage resource agency. NO heritage remains have been uncovered on site according to the knowledge of the ECO.	
No-go / sensitive areas	No sensitive areas were identified on the site. Topsoil stockpiles are to be demarcated with danger tape and seen as no-go areas. Topsoil is currently stockpiled across various locations on-site.	Compliant
Access route/haul roads	Existing access road are used to gain access to the site. Any authorised clearing for access roads must be done in consultation of the ECO. Access roads for earthmoving-equipment must be clearly designated and be positioned as close as possible to the proposed development site. Access to the site is regulated by a security guard at the entrance of the site. The access point of the site has moved northwards at on new Eskdale Street as construction has started at the existing access point.	Compliant
Crime, safety and security	No site staff, other than security personnel and skeleton staff shall be housed on site unless otherwise stipulated in the	Compliant

	Environmental authorisation. Security personnel and skeleton staff shall be supplied with adequate protective clothing, ablution facilities, water and refuse collection facilities. The boundary fence serves to prevent any unauthorised access, access to the site is controlled by a security guard at the gate at which persons entering the site must sign in. An Occupational Health and Safety Officer was appointed to audit the site in terms of Occupational Health and Safety Act, 1993 (Act No. 85 of 1993). Emergency numbers are displayed at the site camp and an emergency assembly point is designated on site.	
Visual impact	Shade cloth is utilized to cordon off the site camp area in accordance with the EMPr. 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 Drakenstein Municipality, Solid Waste removal department.	Compliant

		
Hydrology	Increased run-off during construction must be managed using berm, storm water retention facility and other suitable structures as required to ensure flow velocities are reduced; this must be done in consultation with the Resident engineer as well as the ECO. Storm water, wherever possible, should be allowed to soak into the land in the area on which the water fell. No Stormwater management issues were noted on site. Stormwater after the rainy periods have been properly managed through the efforts of the contractor.	Compliant

		
Soil	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. Topsoil was temporarily windrowed and stockpiled next to excavation area. Stockpiles were not higher than 2m.	Compliant
Services Installation	According to the knowledge of the ECO the current excavated sewer trench is not located in a preferential flow path.	Compliant
OPERATIONAL PHASE EMPr		
Waste management	Waste must be managed according to the Waste Minimization Plan.	Premature

Storm water 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. 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
Atmospheric pollution 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	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).	Premature

Safety and Security	Boundary wall must be regularly inspected and maintained to prevent any damage. All fencing on site must be managed in terms of the Fence Act No. 31 of 1963. All maintenance and repair work must be done in accordance with National Building Regulations and Standards Act 103 of 1977.	Premature
Traffic management	It must be ensured that a backlog of traffic does not develop at access points during peak hours, through the implementation of an efficient and effective access control system. All traffic management must be done in accordance with the National Road Traffic Act No. 93 of 1996.	Premature
Landscape maintenance	Where applicable landscaped areas must be maintained in terms of the general conditions set out in the approved landscape plan. Fine spray into adjacent areas shall be minimised by using low pressure sprayers or watering by hand – spraying of water to be minimised during high wind conditions. Prior to the use of groundwater for any construction related purpose, the water quality is to be analysed by an accredited laboratory.	Premature

Infrastructure maintenance	All buildings must be maintained in accordance with engineer's specifications. In case of emergency sewage leaks, effluent must not be discharged into any water course or water body. All taps must be regularly inspected for leaks and washers or valves replaced as required. Inspect the development for burst, blocked or leaking water pipes and repair as required.	Premature
--	---	------------------

FINDINGS IN TERMS OF THE GRANTED ENVIRONMENTAL AUTHORISATION

EA Condition No.	Description of each Condition	Comments on Compliance
		Compliant
		Partial-Compliant
		Non-Compliant
		Require Confirmation
		Premature
		Note
		Not Auditable
1	The holder is authorised to undertake the listed activities specified in Section B above in accordance with, and restricted to, the Layout Alternative 1, described in the BAR, dated August 2022, at the site as described in Section C above.	Not Auditable
2	The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority. This Environmental Authorisation is granted for- (a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities.	Compliant Construction commenced within the stipulated 5-year period. Environmental Authorization was granted on the 02nd of December 2022 thus the listed activates commenced within 3 years.

	(b) A period of 10 years, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities 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.	Note The holder holds all responsibility for the actions undertaken by anyone on site. Holder of the EA to please take note
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 authorization in terms of the applicable legislation.	Compliant The original EA was issued on the 02nd of December 2022. Part 1 amendment has since occurred and was subsequently approved on the 20th of May 2025.
5	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities. The notice must: 5.1 make clear reference to the site details and EIA Reference number given above; and 5.2 include proof of compliance with the following conditions described herein:	Compliant The notification of commencement was sent to the competent authority on the 10th of January 2025. The

	Conditions: 6, 7, 12 and 13	notice made clear reference to the site details and the reference number. The notice included proof of compliance with condition 6, 7, 12 and 13.
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 outcome of 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 Appeals Regulations, 2014 (as amended) detailed in Section G below; 6.3 draw the attention of all registered I&APs to the manner in which they may access the decision; and 6.4 provide the registered I&APs with:	Compliant The EA was issued on the 02nd of December 2022, and the I&APs were notified of the EA on the 05th of December 2022, so within 3 days of the EA being issued.

	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, of the holder; and 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).	
7	The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.	Compliant A letter to notify the Department of the intended commencement of activities was submitted to the Department on the 10th of January 2025 notifying the Department that the appointed contractor intends to commence with listed activities on the site within two weeks as granted in the Environmental Authorisation (EA) dated 02 December 2022.

8	The draft Environmental Management Programme (“EMPr”) 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 MMP adopted as part of this Environmental Authorisation must be implemented.	Note Holder of the EA to please take note
10	The EMPr and MMP must be included in all contract documentation for all phases of implementation.	Compliant The EMP have been included in the tender documentation.
11	The Rehabilitation and Alien Clearing Management Plan dated 25 October 2021 must be implemented.	Note Holder of the EA to please take note
12	A Stormwater Management Plan must be submitted to the Drakenstein Municipality for approval. The approved Stormwater Management Plan must be submitted to this Department prior to the commencement of construction activities on the site.	Compliant The stormwater management plan was submitted to the Drakenstein

		Municipality and was approved on the 3rd of December 2024.
13	The holder must appoint a suitably experienced environmental control officer ("ECO"), before commencement of any construction activities to ensure compliance with the EMPr and the conditions contained herein.	Compliant Guillaume Nel Development Consultants have been appointed to conduct environmental audits on the site. Renus Pieterse is the ECO responsible for the site.
14	The ECO must conduct fortnightly monitoring inspections during the construction phase. Monthly Environmental Compliance Reports must be compiled and must be submitted to the Competent Authority for the duration of the construction phase. The final Environmental Compliance Report must be submitted to the Competent Authority within one month of construction having been completed.	Compliant Audits are conducted fortnightly and monthly reports will be distribute to DEA&DP.
15	A copy of the Environmental Authorisation, EMPr, MMP, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request, including a publicly accessible website.	Compliant A copy of the EA and EMPr is kept on-site in the environmental file.

16	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.	Compliant The site and mentioned reports will be made available to authorized officials when requested.
17	In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of Environmental Authorisation, the EMPr and the MMP. The Environmental Audit Report must be prepared by an independent person that is not the ECO referred to in Condition 10 or the EAP and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). Environmental Audit Reports must be submitted to the Competent Authority during the construction phase. The first Environmental Audit Report must be submitted three months after the commencement of construction activities and every twelve (12) months thereafter. A final Environmental Audit Report must be submitted within three months of the construction phase having been completed. The holder must, within 7 days of the submission of an environmental audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report immediately available to anyone on request and on a publicly accessible website (where the holder has such a website).	Partial- Compliance An external auditor has been appointed, and a site visit is scheduled for the coming week.

18	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 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; and/or graves or unmarked human burials including grave goods and/or associated burial material.	Compliant No heritage remains were discovered during construction to the knowledge of the ECO.
19	A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.	Compliant A qualified archaeologist and/or paleontologist will be contacted should any heritage remains be discovered on site.

PROGRESS

The contractors are currently busy with the laying of internal roads for the development.



CONCLUSION

Besides the two partial compliances there are no major issues noted on the site .

Compiled by:



Renus Pieterse

for GNEC

Guillaume Nel 
environmental consultants