

THE PROPOSED DEVELOPMENT OF THE CALCUTTA PUBLIC CEMETERY AND MEMORIAL PARK ON FARM NO. 29, STELLENBOSCH

Original EA DEA&DP Ref: 16/3/3/1/B4/45/1030/19

Amendments Ref: 16/3/3/5/B4/45/1058/24 & 16/3/3/5/B4/45/1020/24

FORMAL ECO AUDIT REPORT

Prepared for:

The Municipal Manager
Stellenbosch Municipality

P.O. Box 17

Stellenbosch

7599

Prepared by:

Guillaume Nel Environmental Consultants

P.O. Box 2632

Paarl

7620

Tel: 021 870 1874

Fax: 021 870 1873

Cell: 076 453 8829 / 072 157 1321

E-Mail: nica@gndc.co.za / guillaume@gnec.co.za



2 September 2025



ABBREVIATIONS

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

INTRODUCTION

This Formal ECO Report is distributed to the project team and the Department after the site audit was undertaken.

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.

PROJECT DESCRIPTION

The development of a public cemetery and memorial park that will comprise:

- A traditional grave area which allows for whole-body burials in traditional underground graves with headstones.
- An informal zone. This zone is non-traditional burial sites within a memorial park/landscaped park/garden area with lawn plaques/or a tree of remembrance/tree as headstone. The zone will incorporate the outspan in the southern section of the site and a wetland buffer zone of 15m for watercourses.
- A columbarium and defined zone. These zones are non-traditional burial sites that comprise of formalized/built, above ground areas where either individual or group burials will take place. These areas include structures with niche/small spaces for placing cremated/legally reduced remains in urns or other approved containers, memorial walls with plaques of remembrance, floor plaques/flat headstones and mausoleums or crypts.
- A defined zone that includes an area for family and group burials and a heroes acre.
- An access road that will be constructed at a dedicated two-way intersection of the R304 at approximate KM 50,37.
- Internal roads of 8m wide near the entrance and around the bus parking and narrower roads for access to other regions within the cemetery and memorial park.
- A perimeter fence with main access gates and an entrance wall on the northern boundary.
- Boardwalks and wooden bridges.
- Gabion lined drift.
- An irrigation reservoir.
- A memorial park center and service zone consisting of:
 - A chapel,
 - Offices and a storage area,
 - Ablution facilities,
 - A workshop,
 - A plant/sapling nursery,
 - Staff accommodation, and
 - A gathering space.
- Installation of conservancy tanks.
- A storm water network and treatment plant. The subsurface storm water network will discharge storm water into a reed bed/storm water treatment system. A storm water attenuation pond will form part of the storm water management system.
- A security route along the boundary of the site.

FINDINGS IN TERMS OF THE APPROVED EMPR DURING THE SITE VISIT ON THE 28TH OF AUGUST 2025

Requirement Please refer to approved EMPr for detailed requirements	ECO comments and/or recommendation	Compliance
		Compliant
		Partial-Compliant
		Non-Compliant
		Require Confirmation
		Premature
		Not Auditable
PRE-CONSTRUCTION (PLANNING) PHASE EMPr		
Environmental File	The following documents have been placed on file: • Environmental Authorisation • EMP • ECO Audits • Method Statements • Environmental Induction and Awareness • Complaints register • Emergency response • Hazardous Chemical Substance register and safety data sheets The FRMMP and WUL have been placed on file.	Compliant

Site demarcation and development	The declaration of understanding has been signed. The entire work site has been demarcated from the front of the site which is the sensitive no go area. The road has also been demarcated.  All construction is limited within the designated construction footprint.	Compliant
Emergencies, non-compliance and communication	• Method Statements have been obtained by the ECO, thank you for that.	Compliant
Flora	A search and rescue have been done on site for all the bulbs on the 25th of February 2025. Another search and rescue was done in Spring 2025 to rescue bulb species, the species have been relocated to the buffer areas.	Compliant

CONSTRUCTION PHASE EMPr		
Fauna and Flora	The contractor did not deface, paint damage or mark any natural features. Vegetation clearance has been done on site, no sensitive vegetation was seen so far. Most of the sensitive bulbs have been removed during the search and rescue. The indigenous vegetation that has been search and rescued can be used in the landscaping of the development. No faunal removal has been done on site. The protected areas on site have been demarcated, thank you for that. A Spring (August/ September) botanical scan is required on the site after alien tree/current plantation is removed. And has been done in August 2025. 	Compliant

Clearing of Vegetation, Stripping & Conservation of Topsoil

Most of the vegetation on site are alien vegetation, and has been removed.

Alien Clearing is completed on site. The cleared vegetation has been mulched during the audit. It is recommended that the compost mulched material be spreaded over the areas that will not be developed as soon as possible. As it will assist with dust supression.



A method statement for the clearing of vegetation has been submitted to the ECO.

Topsoil was stockpiled on site and should please be placed back on site.

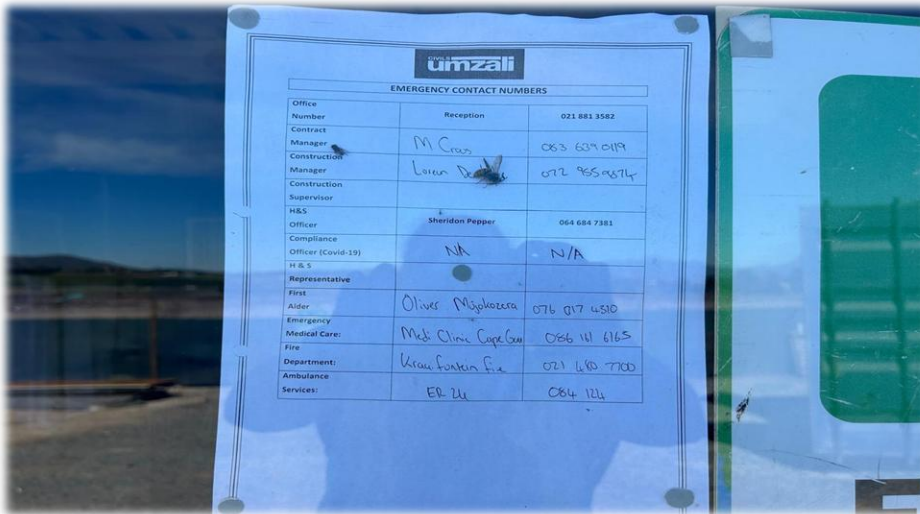
Compliant

		
Protection of Archaeological & Paleontological Remains	No remains have been discovered. In the event that previously unknown archaeological features are exposed during the construction phase, the Contractor should inform the Engineer and the ECO who will advise the Applicant on the necessary course of action.	Not auditable
Appropriate Use of Machinery	No generators were noted on site during the audit. Fire fighting equipment has been placed on site. No fuel or oil leaks were seen on site.	Compliant
Demarcating and Fencing	The site has been demarcated with danger netting during the audit and is sufficient according to the ECO.	Take note

	The construction of the walled/solid barrier on the northern perimeter of the development has not commenced yet. A meeting will be setup on site to discuss the walled barrier to be erected with the relevant parties. The Department advised that a Regulation 34 audit must be done to amend the EMPr for this walled barrier to be fencing. Quotations have been obtained for the audit. <i>In the Heritage Impact Assessment a suggestion was made with regards to the fencing:</i> <i>4.2 Should fencing be required use clear-view fencing or similar is preferred, not palisade. It should be coloured a dull green to match the local environment and not black, silver, brown or other unnatural, standard commercial colours.</i> <i>Although after careful consideration it was decided that black blends better with the shadows on site and was approved by the Municipality.</i>	
No go areas	The construction site has been demarcated, the contractor demarcated the access road as well, thank you for that.	Compliant
Water, Storm water, Erosion & Sedimentation Control	No erosion was noted on site as yet, the heavy rains should please be monitored, and the contractor to advise on how stormwater will be managed.	Require confirmation

		
Fuel, Tar Compounds and Oil	No fuel storage was seen on site, the contractor should advise if a bulk fuel tank will be installed or a bowser used. A small spill was noted in the site camp, the contractor was advised to please remove the spill with the spill kit, and to ensure the drums are placed on an impermeable area.	Partial Compliant

	 No generators were seen on site. A brick storage unit was made in the site camp for any oils to be kept.	
Hazardous Substances	No hazardous substances are stored on site to date. No hazardous building materials were noted on site.	Not auditable
Concrete Works	Batching was not done on site during the audit.	Not auditable
Blasting / drilling	No blasting or drilling has been done on site.	Not auditable
Fires and smoking	No fires are allowed on site. Adequate fire fighting equipment was noted on site.	Compliant

	Emergency numbers have been placed on display at the site camp.  <table border="1"> <thead> <tr> <th colspan="3">umzali EMERGENCY CONTACT NUMBERS</th> </tr> </thead> <tbody> <tr> <td>Office Number</td> <td>Reception</td> <td>021 881 3582</td> </tr> <tr> <td>Contract Manager</td> <td>M. Cross</td> <td>083 639 0119</td> </tr> <tr> <td>Construction Manager</td> <td>Loren De Klerk</td> <td>072 955 0674</td> </tr> <tr> <td>Construction Supervisor</td> <td></td> <td></td> </tr> <tr> <td>H&S Officer</td> <td>Sheridon Pepper</td> <td>064 684 7381</td> </tr> <tr> <td>Compliance Officer (Covid-19)</td> <td>NA</td> <td>N/A</td> </tr> <tr> <td>H&S Representative</td> <td></td> <td></td> </tr> <tr> <td>First Aider</td> <td>Oliver Mphahlela</td> <td>076 917 4510</td> </tr> <tr> <td>Emergency Medical Care:</td> <td>Medi Clinic Cape Town</td> <td>086 111 6165</td> </tr> <tr> <td>Fire Department:</td> <td>Kraaihoek Fire</td> <td>021 640 7700</td> </tr> <tr> <td>Ambulance Services:</td> <td>ER 111</td> <td>084 124</td> </tr> </tbody> </table>	umzali EMERGENCY CONTACT NUMBERS			Office Number	Reception	021 881 3582	Contract Manager	M. Cross	083 639 0119	Construction Manager	Loren De Klerk	072 955 0674	Construction Supervisor			H&S Officer	Sheridon Pepper	064 684 7381	Compliance Officer (Covid-19)	NA	N/A	H&S Representative			First Aider	Oliver Mphahlela	076 917 4510	Emergency Medical Care:	Medi Clinic Cape Town	086 111 6165	Fire Department:	Kraaihoek Fire	021 640 7700	Ambulance Services:	ER 111	084 124	
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Emergency Procedures	All staff have been inducted with the basic emergency procedures in the event of an emergency. The contractor is advised to please contact the relevant authority if a fire starts on site. No spills were noted on site.	Compliant																																				
Dust	Dust was not a problem during the audit, the contractor should please ensure that dust suppression is done on the warm dry days. The contractor is advised to please spread the mulched material over the areas that will not be developed on site that has been cleared.	Compliant																																				

Solid Waste Management	No litter was seen on site. A litter structure was made available on site, although not a lot of litter is generated on site.  All waste disposal slips should please be sent to the ECO.	Compliant
Stockpiling	All the stockpiling of materials was done on the construction footprint, thank you for that. No stockpiles were higher than 2m during the audit. The mulch has been stockpiled on site.	Compliant
Preparation of Building Material	No delivery drivers were seen on site during the audit. No imported material was noted on site. The contractor is advised to please screen all imported material before being used on site.	Compliant

Discharge of Construction Water	No discharging of water was done on site. The contractor should ensure that sediment traps are used within the stream where the culvert construction has been done. One sediment trap within 5m of the outlet should suffice. 	Partial Compliant
Treating (flushing / testing) of Pipelines (if required)	Cleaning/sterilization/flushing of pipelines shall not impair surrounding environmental quality. Any contaminated water from such activities shall be contained until it complies with the standards contained in the National Water Act or other relevant Acts, as well as those laid down by the Local Authority. Alternatively, it shall be removed from site and disposed of at an approved waste disposal site.	Premature

Contractors Temporary Camping Site & Eating Areas	An eating area was placed on site, thank you for that. No cooking facilities on site.	Compliant
Traffic, Access Routes & Haul Roads	No additional roads have been constructed other than the access road. No trucks were seen driving on any other roads. The access road being constructed is on the footprint of the road to be constructed as part of the SDP. No temporary roads were noted on site, except for the roads that were on site initially.	Compliant
Site Clean Up and Rehabilitation	The Contractor must ensure that all structures, equipment, materials and facilities used or created on site for or during construction activities are removed once the project has been completed. The construction site must be cleared, and cleaned to the satisfaction of the ECO. Immediately after the demolition of the campsite, the contractor shall restore the site to its original state, paying particular attention to its appearance relative to the general landscape.	Premature
Land Management	No soil erosion was noted on site. A search and rescue have been done before the areas were cleared. The contractor was completed with the alien vegetation removal on site during the audit.	Compliant
Socio-Cultural Issues	Adjacent landowners should be treated with respect.	Take note

	The construction of the walled/solid barrier on the northern perimeter of the development has not commenced yet. A meeting will be setup on site to discuss the walled barrier to be erected with the relevant parties. The Department advised that a Regulation 34 audit must be done to amend the EMPr for this walled barrier to be fencing. Quotations have been obtained for the audit.	
Drainage line reshaping	Channel banks must be re-sloped to a slope of 1:5 such that the channel profile forms a wide V-shape. All material removed from the banks is to be used to fill in the centre of the water course to assist in forming the correct profile. Soil is to be compacted across the entire channel. Ensure that no straightening of the channel occurs and that the current position of the watercourses do not change. Re-shaping must be done by hand using spades, and no vehicles or machinery is to be used. Re-shaping should be conducted within the first year of the construction phase, during the dry summer months (October to March). Plant the reshaped banks of the drainage line as per section 2.2.5 below to increase surface roughness and bank stability. Planting must take place right across the reshaped channel. Where significant erosion occurs during the first winter after reshaping and planting, geotextile blankets must be laid, with small holes cut to allow plants to protrude.	Take note

	Geotextile fabrics must be staked to the bank in rows across the channel at 50cm intervals, with the rows also 50cm apart. use stakes cut from previously felled alien vegetation of at least 20mm thick and at least 30cm long with at least 20cm driven into the underlying soil.	
OPERATIONAL PHASE EMPr		
MANAGEMENT SPECIFICATIONS (OPERATIONAL PHASE)	During the operational phase, the site must be well-maintained, and activities carefully monitored to ensure environmental compliance. The applicant remains responsible for legal obligations and potential consequences of negligence. The EMPr guides the Property Owner/POA in managing the site sustainably, minimizing negative impacts, and enhancing positive ones. All maintenance activities must align with section 17 of this document, and any major environmental incidents must be reported to DEA&DP.	Not Auditable
Wetland revegetation	A preliminary species list for re-vegetation of the wetland mosaic has been compiled (refer to Appendix 1), but this not exhaustive nor prescriptive. While limited planting will take place for the purpose of erosion control in the drainage line and for establishment of the buffer, the wetlands must not be planted until two years after alien clearing has taken place to allow species dormant within the seed bank to re-emerge. After two years (or sooner if advised by a SACNASP botanical specialist), spring species lists are to be compiled by a SACNASP registered Freshwater Specialist or Botanist and recommendations for additional planting can then be supplied in order to reach adequate vegetation cover within these portions of the wetlands. Revegetation using seed mixes is also recommended and also seed may be harvested from the planted vegetation when mature and seedlings grown in a nursery for later	Premature

	planting. This ensures that the correct species and genetic material is used to rehabilitate the wetlands. The practicality of this approach can only be assessed two years after initial alien clearing.	
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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
		Not Auditable
1	The holder is authorised to undertake the listed activities specified in Section B above in accordance with, and restricted to, Alternative 1, as described in the BAR dated May 2019 at the site as described in Section C above.	Note
2	The holder must commence with the listed activities within the stipulated validity period for which this Environmental Authorisation is granted, 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 period of ten (10) years, from 20 September 2019 (date of the original EA) until 20 September 2029, during which period the holder must commence with the authorised listed activities.	Compliant The EA is granted until the 20th of September 2029, construction commenced in 2025, which is 5 years from the EA being granted. The contractor should be completed with the works before 2029.

	A period of five (5) years , from the date the holder commenced with the authorised listed activity, during which period the authorised listed activities must be concluded.	
3	The development must be concluded within 10 years from the date of commencement of the first listed activity.	Compliant Construction commenced on the 10 th of March 2025, construction should be completed by 2029.
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.	The Holder should please take note of this condition.
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.	Compliant No changes to or deviations from the scope were observed.
6	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities.	Compliant A notification of commencement has been sent to the Competent Authority

	6.1 The notice must make clear reference to the site details and EIA Reference number given above. 6.2 The notice must also include proof of compliance with the following conditions described herein: Conditions: 7, 8, 12 and 18	on the 3rd of June 2024, and construction commenced in March 2025. The commencement notification included the proof of Conditions 7, 8 and 12.
7	The holder must in writing, within 14 (fourteen) calendar days of the date of this decision— 7.1 notify all registered Interested and Affected Parties (“I&APs”) of: 7.1.1 the outcome of the application; 7.1.2 the reasons for the decision as included in Annexure 3; 7.1.3 the date of the decision; and 7.1.4 the date when the decision was issued. 7.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2014 (as amended) detailed in Section G below; 7.3 draw the attention of all registered I&APs to the manner in which they may access the decision; and 7.4 provide the registered I&APs with: 7.4.1 the name of the holder (entity) of this Environmental Authorisation; 7.4.2 name of the responsible person for this Environmental Authorisation;	Compliant The 2024 EA has been granted on the 25th of April 2024, the I&AP’s were notified of the EA on the 26th of April 2024, one day after the EA was granted.

	7.4.3 postal address of the holder; 7.4.4 telephonic and fax details of the holder; 7.4.5 e-mail address, if any, of the holder; and 7.4.6 contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended).	
8	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 The I&APs were notified on the 26th of April 2024, and the letter of commencement for site preparation was sent on the 3rd of June 2024. More than 20 days from the I&AP notification.
9	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.
10	The Freshwater Rehabilitation, Maintenance and Management Plan ("FRMMP") adopted as part of this Amended Environmental Authorisation must be implemented.	Compliant

		The FRMMP should please be implemented on site.
11	The EMPr and FRMMP must be included in all contract documentation for all phases of implementation.	Compliant The EMPr and the FRMMP was included in the contract documentation.
12	The holder must appoint a suitably experienced environmental control officer (“ECO”), or site agent where appropriate, before commencement of any land clearing or construction activities to ensure compliance with the EMPr, FRMMP and the conditions contained herein.	Compliant GNEC was appointed as ECO on site before construction commenced on site.
13	A copy of the Environmental Authorisation, EMPr, FRMMP, audit reports and compliance monitoring reports must be kept at the site of the authorised activity, and must be made available to anyone on request, including on a publicly accessible website.	Compliant The EA, EMPr, FRMMP and audit reports were placed on file.
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.	Compliant Access to the site in section C has been granted.

15	In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). The ECO must conduct fortnightly site audits. Monthly ECO Audit Reports must be submitted to the Competent Authority for the duration of the construction phase. The final Environmental Audit Report must be submitted to the Competent Authority six months after operation commenced. The holder must, within 7 days of the submission of each of the above-mentioned reports 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).	Premature An External Audit report should please be done six months after operation commenced.
16	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.	Not auditable No heritage remains have been exposed on site.

17	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.	Noted No heritage remains have been exposed on site.
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MAJOR AREAS OF CONCERN

No major areas of concern were found on site other than the general findings above.

Compiled by:



Nica Kotze

for GNEC