

**THE PROPOSED LA GARONNE SPARKLING WINE PRODUCTION FACILITY ON
REMAINDER OF FARM 1610 AND FARM 1772, PAARL, STELLENBOSCH
MUNICIPALITY.**

Ref: 16/3/3/1/B4/12/1069/23

FORMAL ECO AUDIT REPORT

Prepared for:

Antonij Rupert Wines (Pty) Ltd

Mr. John Sutherland

P.O Box 435

Franschhoek

7690

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: divan@gnec.co.za / guillaume@gnec.co.za



24 November 2025



ABREVIATIONS

DEA&DP	Department of Environmental Affairs and Development Planning
DEA.....	Department of Environmental Affairs
DWS.....	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO.....	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Programme
EO	Environmental Officer
ESO	Environmental Site Officer
GNEC	Guillaume Nel Environmental Consulting
I&AP	Interested and Affected Parties

INTRODUCTION

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

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 proposed development of a sparkling wine production facility of approximately 3 420m² in extent. The facility will house the various components related to the different stages in the production chain, including the following:

- A dry goods store,
- Chemical, dry good, sales and marketing stores,
- A Workshop, a Laboratory, a Compressor room, Offices, a staff green room,
- Bottling lines, and
- Fire sprinkler pumps and tanks

CLOSE OUT FINDINGS REQUIRED

	Finding	Close Out Recommendation
1.	Cement	Cement remains were noted on site and should please be regularly removed from site and be disposed of.

FINDINGS IN TERMS OF THE APPROVED EMPR DURING THE SITE VISIT ON THE 20TH OF NOVEMBER 2025

Requirement	ECO comments and/or recommendation	Compliance
Please refer to approved EMPr for detailed requirements		Compliant
		Partial-Compliant
		Non-Compliant
		Require Confirmation
		Premature
		Not Auditable
PRE-CONSTRUCTION (PLANNING) PHASE EMPr		
Visual Impact	- Light output is to be confined within property boundaries through using specifically designed luminaries such as full cut-off luminaries to minimize upward spread of light near to and above the horizontal Figure 1 – A; - Spotlight luminaries to be tilted in order to direct the light to the intended spot, instead of allowing it to light areas outside its purpose. - Outdoor spotlights to be mounted on the appropriate pole height. Higher mounting heights allow lower main beam angles which can reduce glare (Figure 1– C).	Compliant

	- Utilize control systems to reduce light levels during inactive periods or at predetermined times while maintaining sufficient lighting for safety and security (NEMA, 2000). - Strict adherence to the tree policy of the Stellenbosch Municipality. - No obtrusive lighting to be used which may pose a light pollution risk to adjacent landowners	
Project contract and programme	Proof of the EMPr within the contract documentation has been sent to the ECO. The EMPr has been placed on file.	Compliant
Appointments and duties of project team	The contact details for the ECO, RE, EO, Contractor and ESO shall be completed on the attached pro forma and a copy kept on site. This document must be made available to the Department of Environmental Affairs and Development Planning (DEADP) on request. Before construction activities commence, role players must have a clear indication to their role in the implementation of this EMP. Subcontractor(s) contracts with the principle contractor must contain a clause to the effect that the disposal of all construction-generated refuse / waste to an officially approved dumping site is the responsibility of the subcontractor in question and that the subcontractors are bound to the management activities stipulated in this EMP.	Compliant

Site demarcation and development	The contractor has signed the declaration of understanding in the EMPr. All construction is limited within the designated construction footprint.	Compliant
Emergencies, non-compliance and communication	The contractor has provided method statements on the protocols to be followed, and contingencies have been put in place for the following, before construction may begin. • Emergency spills procedures for the contamination of soils from spills and fire • Handling & storage of oils and chemicals • Cement and concrete batching, which includes the storage, washing & disposal of cement, packaging, tools and plant. • Diesel tanks and refuelling procedures • Crew camps and construction lay down areas • Workshop maintenance and cleaning of plant Communication in emergencies must follow the suggested lines of communication as stipulated	
Fauna	All <i>possible</i> sensitive faunal species present on the site must be rescued and relocated to another suitable location prior to the commencement of construction activities.	
CONSTRUCTION PHASE EMPr		

Stockpiles	Topsoil must be seen as a no-go area, but demarcation is not necessary. Topsoil and subsoil are to be stored separately. Stockpiles must not be higher than 2m to avoid compaction thereby maintaining the soil integrity and chemical composition. Stockpiles were noted on site, the stockpiles are within the maximum threshold of 2m, thank you for that. 	Compliant
Specific freshwater construction mitigation measures	Construction activities should preferably take place during the dryer summer months. Contaminated runoff from the construction site should be prevented from entering either Wetland A or B.	

Oil and chemicals	Method statements have been provided for handling and storage of chemicals and oil.	Compliant
Cement	Cement batching was active during this audit and has taken place on impermeable areas, thank you for that.  Some remains were noted on site, the contractor is advised to please remove the remains off from site.	Partial Compliant

		
Dangerous and toxic materials	A generator was noted on site and on top of concrete flooring, thank you for that.	Compliant

		
Bulk storage of fuels and oils	No bulk storage of fuels and oils are on site. No bowzers or fuel tanks were noted.	Compliant
Use of dangerous and toxic materials	Firefighting equipment and an oil spill kit have been placed on site. All staff should receive some sort of fire training. No spills have been recorded on site.	Compliant
Eating areas and camp followers	An eating area was provided the area was neat and tidy.	Compliant
Toilets and ablution facilities	A sufficient number of toilets were noted on site, thank you for that.	Compliant



Cleaning of the toilets were noted during tis audit, thank you for that.



Waste management	Good waste management was observed during the audit. Some litter was noted on site, the contractor is advised to please ensure that the litter is placed into bins and removed off from site regularly.  Waste awareness should please be done with the workers on site.	Compliant
Dust	According to the ECO dust will not be a problem.	Compliant
Workshop equipment, maintenance and storage	No spillages were observed in the site camp/ workshop area during the audit. A oil spill kit should please be placed on site.	Compliant

Noise	No excessive noise was heard during the audit, and construction is only active during working hours.	Compliant
Crew camps	No staff are accommodated on site.	Compliant
Fires	A method statement for fires have been received to date, and firefighting equipment should please be placed on site.	Compliant
Erosion and sedimentation	No erosion runnels or sedimentation was observed at any of the working areas.	Compliant
Fauna	No fauna was observed during the audit, and a fauna awareness talk should please be done on site.	Compliant
Flora	Rehabilitation will be done as soon as construction is done.	Premature
Heritage	No archaeological artefacts or human remains have been discovered during the project timeline.	Compliant
Access route/haul roads	All access roads to the construction site are existing roads.	Compliant
Crime, safety and security	Emergency numbers and procedures should be displayed on site.	Compliant

Visual impact	Shade cloth should please be placed to conceal laydown and storage areas. 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 Stellenbosch Municipality; Solid Waste removal department. The construction demarcated sufficiently. 	Compliant
Hydrology	No excessive stormwater runoff was observed during this audit. Stormwater should be allowed to soak into the land on which the water fell.	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	Compliant

	include comprising the permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas. Topsoil must be deemed to be the top layer of soil containing organic material, nutrients and plant grass seed. For this reason, it is an extremely valuable resource for the rehabilitation and vegetation of disturbed areas. At the beginning of the construction phase, topsoil removed for vegetation clearance must be stripped to a minimum depth of 300 mm and stockpiled on the demarcated topsoil stockpile areas. All topsoil must be removed and stockpiled on the site. However, the use of topsoil for rehabilitation contaminated by the seed of 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. Stockpiles must not be higher than 2m to avoid compaction. Dust suppression is necessary for stockpiles older than a month – with either water or a biodegradable chemical binding agent. Backfill will require contouring to ensure that it blends in with the surrounding environment.	
--	---	--

OPERATIONAL PHASE EMPr		
Waste management	No waste will be generated by the use of the road and structures during the operational phase. All litter and rubble will be removed before the contractor leaves the site.	Not Auditable
Stormwater Management	Storm water, wherever possible, must be allowed to soak into the land in the area on which the water has been discharged. No waste or refuse must be allowed to access the storm water infrastructure. In the event that silt runoff occurs off the development site, the cause of this must be investigated and suitable mitigation measures employed. This may include the vegetation of bare areas, installing flow diversion channels in consultation with an engineer, installing velocity reducing structures etc.	Premature
Specific freshwater operational mitigations	Should any natural areas be disturbed during the construction phase, these areas should be rehabilitated and vegetated with indigenous vegetation. Installation subsoil drains as proposed in the geotechnical report of the proposed development, is strongly advised. A buffer area of 10m should be kept from both wetland areas for all future activities.	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 Atmospheric Pollution Prevention Act, 1965 (Act No. 45 of 1965), this includes the control of noxious and offensive gases, smoke, dust and vehicular emissions. Under no circumstances may heavy smoke be released into the air.	Premature
Safety and security	Boundary wall must be regularly inspected and maintained to prevent any damage.	Premature
Traffic management	All traffic management must be done in accordance with the National Road Traffic Act No. 93 of 1996	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
		Not Auditable
1	The holder is authorized to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Alternative, as described in the BAR dated November 2023 on the site as described in Section C above	Note
2	The holder must commence with, and conclude, the listed activities within the stipulated validity period which the Environmental Authorisation is granted, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority. a) A period of ten (10) years from the date of issue, during which period the holder must commence with the authorized listed activities. b) A period of ten (10) years, from the date the holder commenced with the authorized listed activities, during which period the authorized listed activities must be concluded.	Compliant The EA was approved on the 15th of March 2024 The EA is valid until 2034

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
4	Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	Note
5	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities. 5.1 The notice must make clear reference to the site details and EIA Reference number given above. 5.2 The notice must also include proof of compliance with the following conditions described herein: Conditions 6, 7 and 11.	Compliant As mentioned above the EA was approved on the 15th of March 2024 and the letter of commencement was sent to the Directorate on the 4th of August 2025.
6	The holder must in writing, within 14 (fourteen) calendar days of the date of this decision-	Compliant

	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; 6.4 provide the registered I&APs with: 6.4.1 the name of the holder (entity) of this Environmental Authorisation, 6.4.2 name of the responsible person for this Environmental Authorisation, 6.4.3 postal address of the holder,	The EA was approved on the 15th of March 2024. The interested and affected parties were notified on the 22nd of March 2024, seven days after the EA was approved.
--	---	--

	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 notified 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
8	The draft Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.	Compliant

9	The Maintenance Management Plan (“MMP”) adopted as part of the Environmental Authorisation must be implemented.	Compliant
10	The EMPr must be included in all contract documentation for all phases of implementation.	Compliant
11	The holder must appoint a suitably experienced environmental control officer (“ECO”) before commencement of any land clearing or construction activities to ensure compliance with the EMPr and the conditions contained herein.	Compliant An ECO was appointed for the construction site.
12	The ECO must conduct monthly site visits, and report on compliance with the EMPr to this Department and the relevant authorities, in writing, on a monthly basis during the construction phase.	Compliant
13	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
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.	Note

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 (other than the ECO appointed in terms of condition 10 above or the appointed Environmental Assessment Practitioner) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). The holder must undertake two environmental audits, with the first Environmental Audit Report being submitted to the Department within three months of commencement of the construction activities during the construction phase and the final Environmental Audit Report within three months after completion of the construction phase. 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).	
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,	Note

	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 palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.	
17	A qualified archaeologist and/or paleontologist 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.	Note
18	The relevant requirements with respect to occupational health and safety must be adhered to at all times.	Note

PROGRESS

The contractor is progressing well on site.



MAJOR AREAS OF CONCERN

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

Compiled by:



Nica Kotze

for GNEC