

**PROPOSED NEW DEVELOPMENT ON THE
REMAINDER OF PORTION 58 OF THE FARM
HARTENBOSCH NO. 217, HARTENBOS.
[GARDEN WALK SHOPPING CENTRE]**

**EXTERNAL ENVIRONMENTAL AUDIT REPORT IN TERMS
OF REGULATION 34 OF THE NEMA EIA REGULATIONS,
2014 (AS AMENDED).**

DEA&DP EIA REF. NO. 16/3/3/5/D6/18/0006/24
NEAS REF. NO. WCP/EIA/AMEND/0000847/2024



Prepared for:
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KAPPEC

18 March 2026

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	March 18, 2026
Public Review Period	Not Applicable
Report Title	Proposed New Development on the Remainder of Portion 58 of the Farm Hartenbosch No. 217, Hartenbos. [Garden Walk Shopping Centre]
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DISCLAIMER

This report has been prepared for Organic Coral Investments 4 (Pty) Ltd, represented by Mr. Carel Johannes Francois Swanepoel, 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 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 information supplied 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 Practitioner, 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

18 March 2026

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 Amended EA
Appendix D:	Copy of EMP
Appendix E:	Commencement Notification and I&AP Database
Appendix F:	ECO reports
Appendix G:	NFA Permit
Appendix H:	Method Statements
Appendix I:	Waste Disposal
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated March 2026, by Organic Coral Investments 4 (Pty) Ltd, represented by Mr. Carel Johannes Francois Swanepoel (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 20 of the Environmental Authorisation and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was initially issued on 22 November 2011 (Ref: EG12/2/3/1-D6/17-1077/08). Subsequently, an Amendment was submitted to transfer the rights and obligations relating to “Development Area B” on the Remainder of Portion 58 of the Farm Hartenbosch No. 217 from Mr. J.J. Claassen to Organic Coral Investments 4 (Pty) Ltd. The amendment also included the deletion of the description of the proposal as it relates to Development Area B, as well as the removal of all references to “Development Area B” and “the Remainder of Portion 58 of the Farm Hartenbosch No. 217” from both the Environmental Authorisation and the approved Environmental Management Programme. Furthermore, all rights and obligations associated with Development Area B were removed, and the existing Environmental Authorisation was split to allow the issuance of a new Environmental Authorisation in the applicant/landowner’s name for the proposed development on the Remainder of Portion 58 of the Farm Hartenbosch No. 217. This amendment was approved on 07 November 2024 (DEA&DP Ref. 16/3/3/5/D6/18/0006/24).

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 Authorisation and the EMP. 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 summarised 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 site visit
- Site Visit
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report

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
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GREY (N/A)	A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.
GREEN (4)	An item is marked green to indicate complete compliance in line with the EMP.
YELLOW (3)	An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.
ORANGE (2)	An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.
RED (1)	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 proposed development involves the construction of a commercial shopping centre and associated infrastructure on the Remainder of Portion 58 of the Farm Hartenbosch No. 217, situated near Hartenbos. The property is located approximately 2 km from the Hartenbos Central Business District, positioned between the N2 National Road and Main Road 344, connecting Hartenbos and Little Brak River. The development will be implemented in accordance with the Site Development Plan (Drawing No: A2389-900 (Rev. B); Date: 2023/09/08) prepared by BAR Architects and approved by the Mossel Bay Municipality on 11 September 2023 (refer to Annexure 2 of this Environmental Authorisation).

The development will occupy an area of approximately 6.8 hectares and will include extensive earthworks in the form of bulk terraces to facilitate building construction, access, parking, and internal traffic flow. The commercial precinct is designed with a “village atmosphere” concept, emphasizing pedestrian-friendly linkages between buildings and a cohesive aesthetic.

The proposed shopping centre will include the following:

- **Anchor and sub-anchor retail:** 8,166 m² GLA
- **Line shops:** 8,055 m² GLA
- **Sit-down restaurants:** 397 m² GLA
- **Drive-through restaurants:** 499 m² GLA
- **Office component (including medical offices):** approximately 800 m² on the first floor
- **Additional facilities:** open-air play area, potential garden centre, home improvement stores, and arts and crafts demonstration areas

The development is planned in phases. The first phase will focus on convenience and general retail, with initial retail space of approximately 250 m², followed by individual buildings linked by covered walkways forming around 3,450 m² of the shopping centre. The second phase will expand general retail offerings to approximately 7,070 m², incorporating restaurants, office spaces, and public amenities. Two vehicle access points will be provided off Divisional Road 6804 and the R102 (opposite Hartenbos Lifestyle Village).

The design incorporates a range of measures to minimize visual impact and integrate the development into the surrounding environment. The main building is strategically positioned approximately 20 meters from the eastern boundary (N2 Highway) and around 16 meters from other boundaries, in line with land use parameters. The building mass has been lowered into the natural ground level to achieve a maximum height of 12 meters. A 7.5-meter-high embankment along the eastern boundary will screen the site from the highway, and indigenous trees will be planted in parking areas to reduce visual intrusion.

Additional visual and environmental mitigation measures include: the use of natural tones for

building finishes, restrained signage on southern, northern, and western facades, careful placement of water tanks below the building mass, constrained window fenestration on sensitive facades, and screening of plant equipment using perforated brick walls or louvre screens. Collectively, these strategies aim to ensure that the Garden Walk development integrates harmoniously into its surroundings while maintaining aesthetic appeal and respecting the privacy and well-being of neighbouring properties.

LISTED ACTIVITIES

Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended.

Activity Number: 27

Activity Description:

The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—

- (i) the undertaking of a linear activity; or
- (ii) maintenance purposes undertaken in accordance with a maintenance management plan

The development of the proposed retail facility will require the clearance of approximately 6.8ha of indigenous vegetation as defined in the EIA Regulations, 2014.

Activity Number: 28

Activity Description:

Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:

- (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or
- (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.

The Portion 58 of the Farm Hartenbosch No. 217 was used for agricultural purposes on or after 1 April 1998. The proposed development entails the development of retail facility of approximately 6.86 outside the urban area.

Environmental Impact Assessment Regulations Listing Notice 3 of 2014, as amended.

Activity Number: 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 development will include the development of roads wider than 4m with a reserve less than 13.5m in areas containing indigenous vegetation outside urban areas.

Activity Number: 12

Activity Description:

The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan

i. Western Cape

- i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;
- ii. Within critical biodiversity areas identified in bioregional plans;
- iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;
- iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or
- v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.

The proposed development of will require the clearance of approximately 6.8ha of indigenous vegetation as defined in the EIA Regulations, 2014 within the Mossel Bay Shale Renosterveld which has a gazetted conservation status of Critically Endangered.

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.

Additional requirement as per the EA of the environmental audit report

20. 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:

20.1. Auditing during the non-operational phase (construction activities):

20.1.1. During the period which the development activities have been commenced with on the site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.

20.1.2. 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 construction phase.

21. The Environmental Audit Report(s), must–

21.1. 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;

21.2. provide verifiable findings, in a structured and systematic manner, on–

21.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and

21.2.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance,

management and mitigation of environmental impacts associated with the undertaking of the activity.

21.3. identify and assess any new impacts and risks as a result of undertaking the activity;

21.4. evaluate the effectiveness of the EMPr;

21.5. identify shortcomings in the EMPr;

21.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;

21.7. 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;

21.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;

21.9. include a photographic record of the site(s) applicable to the audit; and

21.10. be informed by the ECO reports.

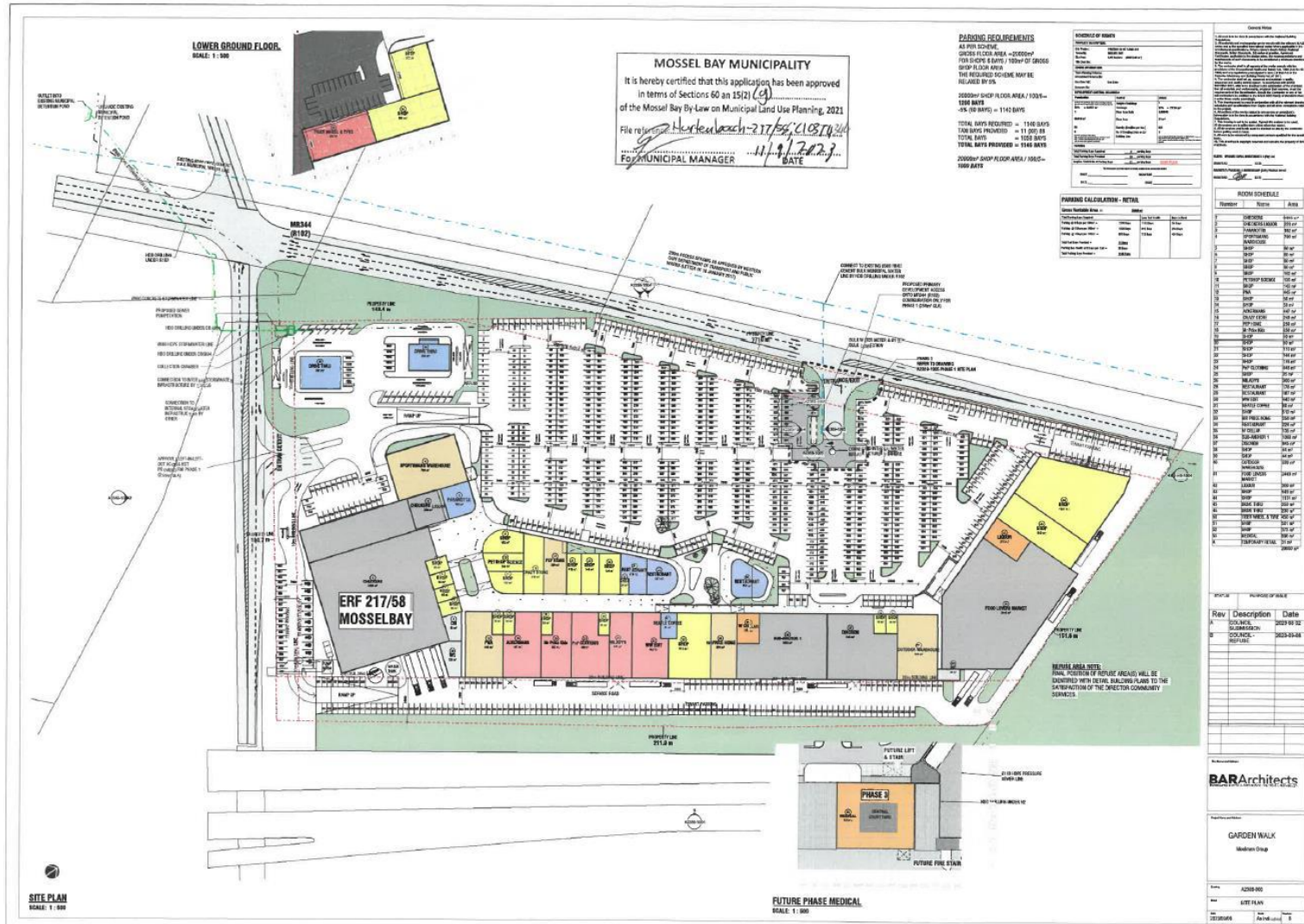


FIGURE 1: SITE DEVELOPMENT PLAN

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 12 November 2029 (validity period), during which period the Holder must ensure that the— (a) physical implementation of all the authorised listed activities, including the installation of bulk services and the construction of the retail facility, is started with and concluded at the site; (b) construction monitoring and reporting requirements are undertaken at the site and submitted to the Competent Authority in time to allow said authority to process such documents timeously;	The original EA was granted on 22 November 2011 (Ref: EG12/2/3/1-D6/17-1077/08). Subsequently, an Amendment was submitted and approved on 07 November 2024 (DEA&DP Ref. 16/3/3/5/D6/18/0006/24). Notification of commencement letter was sent to the Department of Environmental Affairs and Development Planning (DEA&DP) on 27th November 2024. The site was officially handed over on 09 December 2024, during which a site walk and site meeting were conducted. An ECO site inspection was undertaken on 08 January 2025 to review site conditions and confirm compliance with the Environmental Management Programme (EMPr). Environmental inductions were conducted with the earthwork's contractor and site personnel on 16 January 2025, followed by an additional induction with the main building contractor on 11 February 2025. HillLand Environmental has been appointed as the ECO for the project. HillLand Environmental conducts weekly site visits and submits monthly monitoring reports to DEA&DP.

	(c) post construction rehabilitation and monitoring requirements is undertaken and completed at the site; 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.	Noted. This will be audited during the final completion audit. Noted. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated March 2026, by Organic Coral Investments 4 (Pty) Ltd, represented by Mr. Carel Johannes Francois Swanepoel (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 20 of the Environmental Authorisation and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).
2.	The Holder is authorised to undertake the listed activities specified in Section B above and in accordance with the SDP described in the Final Impact Report dated 22 July 2024 on the site as described in Section C above. The development of a commercial shopping centre and associated infrastructure on the Portion 58 of the Farm Hartenbosch No. 217 near Hartenbos. The proposed commercial shopping centre will consist of the <i>inter alia</i>: • 8 166m2 GLA for anchor shops and sub-anchor shops • 8 055m2 GLA for line shops; • 397m2 GLA for sit down restaurants; • 499m2 GLA for drive-through restaurants; and • associated infrastructure, including parking areas. The proposed development will be implemented in accordance with	Noted. All listed activities and the preferred alternative as outlined in the Amended EA are being implemented accordingly

	the Site Development Plan (Drawing No: A2389-900 (Rev. B); Date: 2023/09/08) compiled by BAR Architects and approved by the Mossel Bay Municipality on 11 September 2023. Refer to Annexure 2 of this environmental authorisation for a copy of the proposed SDP.	
3.	This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme ("EMPr").	Noted, the approved Amended EMPr (Ref.: MOS24.1262.12) is being implemented.
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 remains responsible for all persons acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.
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 final amended Environmental Authorisation (EA) was approved.
6.	The Holder must in writing, within 14 (fourteen) calendar days of the date of the decision as set out in Section A of this New Environmental Authorisation – 6.1. notify all registered Interested and Affected Parties ("I&APs") of – 6.1.1. the decision reached; 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.	The I&APs were notified of the amended EA on the 7 th of November 2024. On the same day the amended EA was granted.

	6.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the Decision as set out in Section A of this New Environmental Authorisation 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 New Environmental Authorisation, 6.4.2. name of the responsible person for this New 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, 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).	No appeals were lodged against the New EA.
7.	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 decision to amend the Environmental Authorisation issued on 22 November 2011 (Ref: EG12/2/3/1-D6/17-1077/08) which implies that the listed activities, including site preparation, may not continue until the appeal is decided.	Noted. No appeals were lodged against the New EA.
8.	The listed activities, including site preparation, may not continue within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of the decision, as set out in Section A of this New Environmental Authorisation.	I&APs were notified of the amended EA on the same day the amended EA was approved, 07 November 2024 (DEA&DP Ref: 16/3/3/5/D6/18/0006/24). A Notification of Commencement was subsequently submitted to the DEA&DP on 27 November 2024.

		The site was formally handed over on 09 December 2024, during which a site walk and site meeting were conducted. An ECO site inspection was undertaken on 08 January 2025. Environmental inductions were thereafter conducted with the earthworks contractor and site personnel on 16 January 2025 and with the main building contractor on 11 February 2025.
9.	Seven calendar days' notice, in writing, must be given to the Competent Authority before continuation any of the activities on site (including site preparation). 9.1. The notice must make clear reference to the site details and EIA Reference number given above. 9.2. The notice must also include proof of compliance with the following conditions described herein: Conditions no.: 6 and 15	DEA&DP was notified of the intended commencement of work on November 7, 2024, and made clear reference to the site details, EIA Reference, and proof of compliance as referred to below: <i>Condition 6: The Holder must in writing, within 14 (fourteen) calendar days of the date of the decision as set out in Section A of this New Environmental Authorisation notify all registered Interested and Affected Parties ("I&APs"). Notification of the decision was provided to I&APs on 7 November 2024. No notification of appeal was received.</i> <i>Condition 15: The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein. HilLand Environmental have been appointed as the ECO for the project.</i> <i>Furthermore, in compliance with Condition 13 of the EA, attached to this letter please find the updated EMPr that incorporate all the conditions contained in the EA.</i> <i>Condition 13: The EMPr must be updated to incorporate all the conditions contained in this Environmental Authorisation and all those measures for the avoidance, management, mitigation, monitoring, contained in the approved EMPr. The updated EMPr</i>

		<i>must be re-submitted to the Competent Authority prior to commencement of the construction activities.</i>
10.	Seven calendar days' written notice must be given to the Competent Authority on completion of the construction activities.	Noted. Construction is still ongoing.
11.	The new Environmental Management Programme ("EMPr") submitted together with the Application for the Amendment of the Environmental Authorisation (EG12/2/3/1-D6/17-1077/08) is herewith approved. The EMPr must be read with this Environmental Authorisation. The EMPr does not substitute any requirements for the avoidance, management, mitigation, monitoring and reporting of the impacts of the activity or conditions contained in this environmental authorisation.	Noted. The updated and approved EMPr is being implemented on-site.
12.	The requirements for the avoidance, management, mitigation, monitoring, rehabilitation and reporting of the impacts of the activity on the environment, which have been identified in this Environmental Authorisation additional to those contained in the approved EMPr, must be implemented together with the EMPr.	Noted. The updated and approved EMPr is being implemented on-site.
13.	The EMPr must be updated to incorporate all the conditions contained in this Environmental Authorisation and all those measures for the avoidance, management, mitigation, monitoring, rehabilitation and reporting as identified in this Environmental Authorisation additional to those contained in the approved EMPr. The updated EMPr must be re-submitted to the Competent Authority prior to commencement of the construction activities.	Noted. As per the ECO reports. Prior to commencement the EMPr was updated and resubmitted to DEA&DP. The updated EMPr is being implemented on-site.
14.	The approved EMPr (including the additional measures for the avoidance, management, mitigation, monitoring and reporting identified in the Environmental Authorisation) must be included in all	Noted, the EMPr has been included in all construction documentation and is being implemented.

	contract documentation for all phases of implementation.	
15.	The Holder must appoint a suitably experienced Environmental Control Officer (“ECO”), for the duration of the construction and rehabilitation phases of implementation contained herein.	HilLand Environmental has been appointed as of January 2025 as the Environmental Control Officer (ECO) to conduct audits on environmental compliance and will subsequently submit a monthly report to your Department.
16.	The ECO must– 16.1. be appointed prior to commencement of any works (i.e. removal and movement of soil); 16.2. ensure compliance with the EMPr and the conditions contained herein; 16.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO; 16.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised; and 16.5. the ECO must conduct site inspections at least every 2 (two) weeks and must submit ECO Monitoring Reports on a monthly basis to the competent authority.	Noted. HilLand Environmental conducts weekly site visits and subsequently submits monthly audit/monitoring reports to DEA&DP.
17.	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.	A digital Environmental File is available and includes all the necessary documentation.
18.	Access to the site referred to in Section C must be granted, and the	Access to the site was permitted via the R102 and Monte Christo

	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.	Rd, Hartenbos.
19.	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.	Noted.
20.	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: 20.1. Auditing during the non-operational phase (construction activities): 20.1.1. During the period which the development activities have been commenced with on the site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority. 20.1.2. 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 construction phase.	Noted. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated March 2026, by Organic Coral Investments 4 (Pty) Ltd, represented by Mr. Carel Johannes Francois Swanepoel (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 20.1.1 of the Environmental Authorisation and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).
21.	The Environmental Audit Report(s), must– 21.1. 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; 21.2. provide verifiable findings, in a structured and systematic	Noted. This audit report includes all relevant information regarding the compliance performance of the contractor and other involved parties during the construction phase.

manner, on– 21.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 21.2.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity. 21.3. identify and assess any new impacts and risks as a result of undertaking the activity; 21.4. evaluate the effectiveness of the EMPr; 21.5. identify shortcomings in the EMPr; 21.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 21.7. 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; 21.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;	Construction work on the development commenced on 09 December 2024, following the official site handover and site walk. As of the current reporting period, construction is ongoing, with an anticipated completion date at the end of March 2026. Key components, including earthworks, building construction, and infrastructure installation, are progressing according to the approved Site Development Plan. Rehabilitation and site maintenance activities are scheduled to commence immediately following the completion of construction. Initial rehabilitation works are planned to begin in April 2026 and will continue over the subsequent months, focusing on landscaping, stormwater management, and restoration of disturbed areas to ensure environmental compliance and site stability.
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	21.9. include a photographic record of the site(s) applicable to the audit; and 21.10. be informed by the ECO reports.	
22.	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).	Noted.
23.	The following requirements for the avoidance, management and mitigation must be implemented in respect of the visual impact of the proposed development: 23.1. implementation and adherence to the establishment of a 20m building line from the eastern boundary (N2 National Road) and 16m building line from all other boundaries; 23.2. the development of a 7.5m high berm along the eastern boundary of the site; and 23.3. the planting on locally occurring indigenous shrubs and trees on the 7.5m high berm.	Noted and complied with – please refer to the SDP attached. Due to the limited available space along the eastern boundary, it was not feasible to construct a traditional 7.5 m-high soil berm, which typically requires a width of approximately 40 m to ensure stability and appropriate slope gradients. As an alternative, the contractor has constructed a retaining wall along the eastern boundary. The top of the retaining wall has been landscaped and planted with indigenous vegetation and trees, effectively providing the intended 7.5m visual buffer and screening from the N2 Highway.
24.	Should any heritage remains be exposed during excavations or any	No heritage remains were exposed during excavations as per

other actions on the site(s), 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.	the ECO reports provided, thus far.
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EA Compliance Rating	100 %
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SITE AUDIT FINDINGS

An external environmental audit and site walkthrough were conducted on 5 March 2026. The audit was undertaken by the appointed independent auditor and accompanied on site by the Environmental Control Officer (ECO). Construction work on the development commenced on 09 December 2024, following the official site handover and site walk. At the time of the audit, construction activities were still ongoing, with the development anticipated to reach completion by the end of March 2026.

The site camp has recently been re-established at the former Swans Nursery, which is accessed from the R102 to the north of the development site. The previous site camp that was established within RE/219 has since been demolished and the area is currently undergoing rehabilitation. Some of the remaining topsoil stockpiles required for rehabilitation and landscaping are temporarily stored within the Swans Nursery area. All topsoil from the site was previously stripped and the required volume for rehabilitation was stockpiled at an off-site location within the Outeniquasbosch development zone. This topsoil has subsequently been transported to the nursery adjacent to the Garden Walk development to facilitate easy access during the rehabilitation phase.

Several rescued plant species, including aloes that were salvaged during the initial vegetation clearing and plant rescue operations, remain temporarily stored within the nursery and will be used during the ongoing rehabilitation of disturbed areas over the coming months. In addition, indigenous trees sourced from external nurseries are currently stored at the nursery. These trees will be used for further landscaping and rehabilitation works, including planting along the retaining structure and landscaped berm along the eastern boundary adjacent to the N2.

Due to the limited space available along the eastern boundary of the site, it was not feasible to construct the originally proposed 7.5 m high soil berm, which would typically require a width of approximately 40 m to maintain stable slope gradients. As an alternative mitigation measure, the contractor constructed a retaining wall along the eastern boundary of the site. The top of this structure has been landscaped and planted with indigenous vegetation and trees to create the intended visual buffer and screening effect from the N2 highway. This alternative approach achieves the same visual mitigation objectives while accommodating the spatial constraints of the site.

Background to Unlawful Clearing on RE/219

During the initial site preparation phase, which included vegetation clearing and plant rescue prior to earthworks, an area on the Remainder of Farm 219 (RE/219) was incorrectly surveyed and staked as part of the approved development footprint. As a result of this surveying error, vegetation clearing occurred within a portion of RE/219 that falls outside of the authorised development area.

The area that was inadvertently cleared is approximately 0.36 ha in extent and is located within the section of the development intended for service yard infrastructure associated with the shopping

centre, including delivery and loading areas for retail tenants. This area has subsequently been hard surfaced as part of the service and delivery yard infrastructure.

Upon identification of the error, the Environmental Control Officer (ECO) immediately reported the non-compliance to the Department of Environmental Affairs and Development Planning (DEA&DP). A Section 24G rectification process, in terms of the National Environmental Management Act (NEMA), was initiated to address the unlawful clearing.

As part of the Section 24G process, specialist assessments were undertaken. The botanical specialist determined that the cleared area does not constitute Critically Endangered vegetation, and therefore, the implication is that the activity does not trigger the specific listed activity in terms of the NEMA Environmental Impact Assessment Regulations. This information has been formally communicated to DEA&DP.

Based on this outcome, it is possible that an amendment to the existing Environmental Authorisation may be required instead of continuing with the Section 24G rectification process. The ECO and the holder of the Environmental Authorisation are currently awaiting formal guidance from DEA&DP regarding the appropriate regulatory pathway.

In the interim, the developer has submitted an application to the relevant municipal planning authority to retain the hard-surfaced service yard area within RE/219 as part of the approved development layout. A retaining wall has been constructed in the RE/219 portion, and rehabilitation of the disturbed areas above the retaining wall is being undertaken in phases using indigenous vegetation. Phase 1 of the rehabilitation has been completed, while Phase 3 is currently in progress.

Current Construction Activities

As construction is approaching completion, final finishing works are currently underway across the development site. These works include final paving installation, cement works, building façade painting, and finishing of external hard surfaces. Construction of the main building structure, associated parking areas, and internal circulation routes is largely complete, with finishing activities taking place in various sections of the development.

Installation of stormwater infrastructure and other external engineering services, including the bulk sewer connection, is ongoing. Final works are also underway at the main entrance of the shopping centre, where paving, stormwater drainage structures, and pedestrian access areas are currently being completed.

As part of the municipal planning conditions, upgrades to the R102 road connection onto Monte Christo Road are being undertaken to accommodate the anticipated increase in traffic associated with the development. These road upgrades form part of the broader external infrastructure improvements linked to the project.

Waste management measures were observed to be in place across the site. Skip bins are located adjacent to active work areas, and waste is removed regularly for off-site disposal. Chemical toilets have been provided in multiple locations around the construction area, including within the parking area and adjacent to the delivery yard, to ensure adequate sanitation facilities for workers.

All cement mixing and related works were observed to be taking place on paved or protected surfaces, thereby preventing contamination of surrounding soils. Construction materials required for the final works are temporarily stored within designated areas, primarily within the delivery yard and adjacent to the active construction zones. Empty cement bags were observed to be properly contained within larger collection bags to prevent littering and facilitate appropriate waste management.

Landscaping works have also commenced in portions of the parking area, where indigenous trees and plant species are being planted as part of the broader site rehabilitation and landscaping plan.

Overall, the site was found to be generally well managed, with construction activities progressing toward the final completion of the development and associated external infrastructure.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Soil Management and Erosion Control	
1.1	Vegetation clearing must be restricted to the approved development footprint.	Vegetation clearing was largely restricted to the approved development footprint. However, a portion of approximately 0.36 ha on the Remainder of Farm 219 (RE/219) was inadvertently cleared during the initial site preparation phase due to a surveying and staking error. This non-compliance was reported to DEA&DP, and a Section 24G rectification process has been initiated.
1.2	Topsoil must be stripped prior to construction activities and stored separately from subsoil.	Topsoil was stripped during the initial site preparation phase and stored separately for later rehabilitation. The required volume of topsoil was initially stockpiled at an off-site location within the Outeniquasbosch development zone and has since been moved to the Swans Nursery area for use during the ongoing rehabilitation and landscaping activities.
1.3	Topsoil stockpiles must not be contaminated with construction waste or rubble.	No evidence of contamination of the topsoil stockpiles with construction waste or rubble was observed during the site inspection.
1.4	Stockpile locations must be approved by the ECO.	Topsoil stockpiles currently stored within the Swans Nursery area were placed under the supervision and approval of the ECO to facilitate easy access during the rehabilitation phase.
1.5	Topsoil stockpiles must be protected from erosion caused by wind and water.	Topsoil stockpiles stored within the Swans Nursery area appeared stable and are being retained for use during the rehabilitation and landscaping phase.
1.6	Appropriate erosion control measures (e.g. silt fencing, sandbags	Exposed soil surfaces on site were limited as construction

	or vegetation cover) must be implemented around stockpiles and exposed soil surfaces.	activities are nearing completion and most areas have already been paved or hard surfaced.
1.7	Silt fencing must be installed where required to prevent sediment movement.	No significant sediment movement was observed during the audit.
1.8	Silt traps and erosion control structures must be inspected regularly and cleared where necessary.	No significant sediment movement was observed during the audit.
1.9	Exposed soil surfaces must be stabilized to prevent erosion.	The majority of exposed soil areas are currently undergoing rehabilitation or have been stabilized through landscaping or paving works.
1.10	Disturbed areas must be rehabilitated as soon as construction activities are completed.	Rehabilitation of disturbed areas is currently underway. The previous site camp located within RE/219 has been demolished and is in the process of being rehabilitated, while rehabilitation of other disturbed areas is being implemented in phases using indigenous vegetation.
1.11	Bare soil must not remain exposed for extended periods without stabilization measures.	No extensive areas of bare soil were observed on site during the audit. Remaining exposed areas are scheduled for rehabilitation during the final landscaping phase.
2.	Pollution Prevention	
2.1	Construction vehicles and machinery must be properly maintained and kept free from oil or fuel leaks.	No visible oil or fuel leaks from construction vehicles or machinery were observed during the site inspection.
2.2	Drip trays must be used beneath stationary machinery where there is a risk of leakage.	Construction machinery present on site appeared to be appropriately managed. Drip trays must be implemented where stationary machinery poses a risk of leakage.
2.3	Oil, fuel or hazardous substances must not be allowed to spill onto the ground.	No evidence of oil, fuel or hazardous substance spills was observed during the site walkthrough.
2.4	Spill kits must be available and easily accessible on site at all times.	Spill kits are available in the container in the delivery yard and site camp.

2.5	All spills must be cleaned immediately and contaminated material must be disposed of appropriately.	No spills were observed during the audit. Any spills that may occur must be cleaned immediately, and contaminated materials disposed of appropriately.
2.6	Chemical toilets must be provided on site and serviced regularly.	Chemical toilets were observed to be provided at multiple locations across the construction site, including within the parking area and adjacent to the delivery yard, ensuring adequate sanitation facilities for construction personnel.
2.7	Chemical toilets must be maintained in a stable condition and must not leak.	Chemical toilets appeared to be stable and appropriately located during the site inspection.
2.8	Cement mixing must take place on impermeable surfaces or mixing trays.	Cement mixing and related cement works were observed to be undertaken on paved and hard-surfaced areas, thereby preventing contamination of underlying soils.
2.9	Cement or concrete must not be mixed directly on bare soil.	Cement and concrete works were not observed to be undertaken directly on bare soil surfaces, as the majority of finishing works are occurring on paved or hard-surfaced areas. Minor cement residue was observed and should be continuously removed as part of the waste disposal efforts.
2.10	Cement-contaminated water must not be discharged into soil, stormwater drains or surrounding natural areas.	No evidence of cement-contaminated runoff entering surrounding soils or stormwater infrastructure was observed.
2.11	Construction equipment must not be washed within the construction site where wash water may contaminate soil or stormwater systems.	No washing of construction equipment within environmentally sensitive areas or near stormwater infrastructure was observed during the audit.
3.	Waste Management	
3.1	A waste management system must be implemented and maintained throughout the construction period.	A waste management system appears to be implemented on site, with skips and bins provided and waste removed regularly.
3.2	Waste skips must be provided in designated areas within the construction site.	Waste skips were observed at multiple locations adjacent to active construction areas across the site.

3.3	Waste must be removed regularly and disposed of at a licensed waste disposal facility.	Waste generated during construction is regularly removed from the site using trucks transporting the skips for off-site disposal.
3.4	Waste storage areas must be kept clean, orderly and clearly demarcated.	Waste storage areas were generally observed to be orderly, with waste contained within designated skip bins.
3.5	Waste containers must be secured to prevent windblown litter.	Waste skips and collection areas appeared stable and appropriately positioned to prevent windblown litter.
3.6	Waste must not be burned or buried on site.	No evidence of waste burning or burial was observed on site.
3.7	Illegal dumping of waste is strictly prohibited.	No evidence of illegal dumping was observed during the site inspection.
3.8	Recycling must be implemented where feasible.	Waste management practices will continue to be monitored during the remaining construction activities.
3.9	The construction site must be kept free of litter at all times.	The construction site was generally observed to be maintained in a clean and orderly condition, with waste materials stored within designated skips and bins.
3.10	Empty cement bags and packaging must be collected and stored in designated bags or containers prior to disposal.	Empty cement bags were observed to be collected and secured within larger collection bags to prevent littering and facilitate appropriate disposal.
4.	Dust, Noise, and Nuisance Control	
4.1	Construction activities must be restricted to approved working hours.	No construction activities outside normal working hours were observed during the audit.
4.2	Dust suppression measures must be implemented where excessive dust generation occurs.	No excessive dust generation was observed during the site inspection.
4.3	Water spraying must be undertaken where necessary to control dust from exposed soil surfaces and stockpiles.	Dust suppression measures will be implemented where required should dust generation occur.
4.4	Construction activities must not generate excessive dust affecting surrounding properties.	No excessive dust affecting surrounding properties was observed during the audit.
4.5	Construction noise must be minimized as far as reasonably	Construction noise levels appeared consistent with typical

	practicable.	construction activities associated with finishing works.
4.6	Construction traffic and site activities must be managed to minimize nuisance to surrounding land uses.	Construction traffic and site activities appeared to be appropriately managed within the development site.
4.7	Construction signage must be installed where required to ensure safe access and movement around the site.	No evidence was observed indicating that protected plant species were removed without the required authorisations.
5.	Vegetation Protection and Plant Rescue	
5.1	A plant rescue programme must be implemented prior to vegetation clearing.	A plant rescue operation was implemented during the initial vegetation clearing phase prior to the commencement of earthworks.
5.2	Rescued plants must be stored and maintained appropriately within a designated nursery area.	Rescued plant species, including aloes salvaged during the plant rescue operations, are currently stored within the Swans Nursery area, where they are being maintained for use during the rehabilitation phase.
5.3	Rescued plants must be incorporated into landscaping and rehabilitation where feasible.	Rescued plants stored within the nursery are intended to/have been reintroduced into landscaped and rehabilitated areas of the site during the ongoing rehabilitation process.
5.4	Landscaping and rehabilitation must utilize indigenous plant species.	Landscaping and rehabilitation activities are being undertaken using indigenous plant species, including indigenous trees currently stored within the Swans Nursery area.
5.5	Protected plant species must not be removed without the necessary permits.	A NFA permit was obtained for the removal and transplantation of a single Milkwood tree.
5.6	Vegetation clearing must remain restricted to approved construction areas.	Vegetation clearing was largely confined to the development footprint, with the exception of the unlawful clearing on RE/219, which is currently being addressed through regulatory processes.
6.	Fauna Protection	
6.1	Construction personnel must not hunt, trap, poison or harm wildlife.	No evidence of hunting, trapping, or harming of wildlife by construction personnel was observed.

6.2	Any wildlife encountered during construction must not be intentionally disturbed or harmed.	No wildlife disturbance incidents were reported during the audit period.
6.3	Injured or trapped wildlife must be reported to the ECO immediately.	No injured or trapped wildlife incidents were reported to the ECO during the audit period.
6.4	Wildlife relocation must only be undertaken under supervision of the ECO or an appropriate specialist.	Noted. Should wildlife relocation become necessary, it will be undertaken under the supervision of the ECO or an appropriate specialist.
7.	Stormwater Management	
7.1	Stormwater outlets must be protected from sedimentation during construction.	Stormwater infrastructure installation is currently underway and will be monitored to ensure that sedimentation is prevented during construction.
7.2	Silt fencing must be installed where necessary to prevent sediment entering stormwater systems.	Sediment control measures were installed and will continue to be monitored and maintained during the remaining construction period.
7.3	Stormwater infrastructure must be inspected regularly for blockages or sediment buildup.	Installation of stormwater infrastructure is currently underway as part of the final external engineering services associated with the development.
7.4	Sediment traps must be cleared when necessary to maintain functionality.	Stormwater infrastructure and sediment control measures were installed and will continue to be monitored and maintained during the remaining construction period.
7.5	Contaminated runoff water must not be discharged into the municipal stormwater system.	No evidence of contaminated runoff entering the municipal stormwater system was observed during the audit.
7.6	Runoff water must be directed away from exposed soil areas where possible.	Surface runoff is directed toward the installed stormwater infrastructure as part of the site drainage design.
8.	Construction Camp and Site Management	
8.1	The construction camp must be established within the approved site camp area.	The construction site camp has recently been re-established within the former Swans Nursery area, which serves as the

		designated camp area for the final stages of construction and rehabilitation activities.
8.2	The construction camp must be maintained in a clean and orderly condition.	The construction camp and surrounding work areas were observed to be generally clean and orderly.
8.3	Adequate ablution facilities must be provided (minimum 1 toilet per 15 workers).	Chemical toilets have been provided at multiple locations across the site to accommodate construction personnel.
8.4	Ablution facilities must be serviced regularly.	Chemical toilets are serviced regularly by the appointed service provider.
8.5	Construction materials must be stored in designated and approved areas.	Construction materials required for final works were observed to be stored within designated areas, primarily within the delivery yard and adjacent to the active work zones.
8.6	Hazardous materials must not be stored on site without approval from the ECO.	Lockable containers are available within the site camp and delivery yard.
8.7	Construction personnel must not reside on site, except for permitted security personnel.	No construction personnel accommodation was observed on site during the audit.
8.8	Open fires are strictly prohibited.	No open fires were observed during the site inspection.
8.9	Emergency contact details must be clearly displayed at the site camp.	Emergency contact details were observed to be displayed within the construction works area of the mall.
9.	Storage of Construction Materials	
9.1	Construction materials must be stored within clearly designated areas.	Construction materials were observed to be stored within designated work areas, including the delivery yard and adjacent construction zones.
9.2	Storage areas must be approved by the ECO.	Topsoil was stripped during the initial site preparation phase and stored separately for later rehabilitation. The required volume of topsoil was initially stockpiled at an off-site location within the Outeniquasbosch development zone and has since been moved to the Swans Nursery area for use during the ongoing

		rehabilitation and landscaping activities.
9.3	Stockpile areas must be demarcated and managed to prevent environmental contamination.	Stockpile areas within the nursery are managed to prevent contamination and are being utilised during the ongoing rehabilitation phase.
9.4	Hazardous materials must not be stored on site unless approved and appropriately contained.	Lockable containers are available within the site camp and delivery yard.
10.	No-Go Areas and Site Demarcation	
10.1	Environmentally sensitive or restricted areas must be clearly demarcated as no-go areas.	The construction area was fully demarcated with green and orange shade netting. Demarcations have been removed for the completion of construction activities.
10.2	No-go areas must be fenced or marked with hazard tape or shade cloth.	The construction area was fully demarcated with green and orange shade netting. Demarcations have been removed for the completion of construction activities.
10.3	Construction activities must not occur outside the approved development footprint.	Construction activities were generally confined to the approved development footprint, with the exception of the inadvertent clearing on RE/219, which occurred due to a surveying error and is currently being addressed through the Section 24G process.
10.4	Adjacent properties must not be accessed without written permission.	No access to adjacent properties was observed during the audit.
11.	Concrete and Cement Works	
11.1	Cement mixing must be undertaken in designated mixing areas.	Cement mixing and related cement works were observed to be undertaken within designated work areas associated with the final construction works.
11.2	Mixing areas must be located on impermeable surfaces or protective sheeting.	Cement works were conducted on paved or hard-surfaced areas, thereby preventing contamination of underlying soils.
11.3	Cement must not be mixed directly on soil surfaces.	No cement mixing was observed directly on exposed soil surfaces.

11.4	Cement spills must be cleaned immediately.	Minor cement residue was observed and should be continuously removed as part of the waste disposal efforts.
11.5	Contaminated soil must be removed and disposed of appropriately.	Minor cement residue was observed and should be continuously removed as part of the waste disposal efforts.
11.6	Concrete trucks must not rinse out on site or along access roads.	No concrete truck rinsing was observed within the construction site during the audit.
12.	Rehabilitation and Landscaping	
12.1	Disturbed areas must be rehabilitated progressively during the construction phase.	Rehabilitation of disturbed areas is being implemented progressively, including the rehabilitation of the previous site camp area within RE/219.
12.2	Topsoil must be replaced in disturbed areas during rehabilitation.	Topsoil that was previously stripped during site preparation is currently being used for rehabilitation and landscaping activities.
12.3	Indigenous plant species must be used for landscaping and rehabilitation.	Indigenous plant species and trees are being used for landscaping and rehabilitation, including those stored within the Swans Nursery area.
12.4	Rescued plants must be utilized where possible during rehabilitation.	Rescued plant species, including aloes salvaged during the plant rescue operations, will be utilized during the ongoing rehabilitation process.
12.5	Erosion control measures must be implemented in rehabilitated areas.	Erosion control measures will continue to be implemented where required as rehabilitation progresses.
12.6	Newly planted vegetation must be maintained until established.	Newly planted vegetation will be maintained during the establishment period as part of the landscaping and rehabilitation programme.
12.7	Stormwater infrastructure must be protected from erosion following rehabilitation.	Noted. This will be monitored during the final external audit after construction has been completed.

EMPr Compliance Rating	97.1%
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CONCLUSION

In conclusion, Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed in March 2026 by Organic Coral Investments 4 (Pty) Ltd., represented by Mr. Carel Johannes Francois Swanepoel (the Applicant), as the independent environmental practitioners to undertake an external environmental compliance audit in fulfilment of Condition 20 of the Environmental Authorisation (EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

The Environmental Authorisation was initially issued on 22 November 2011 (Ref: EG12/2/3/1-D6/17-1077/08). An amendment was subsequently approved on 07 November 2024 (DEA&DP Ref. 16/3/3/5/D6/18/0006/24), which transferred the rights and obligations relating to the development to Organic Coral Investments 4 (Pty) Ltd., and resulted in the Environmental Authorisation being split to allow the issuance of a new Environmental Authorisation in the applicant's name for the proposed development.

During the initial site preparation phase, an area of approximately 0.36 ha on the Remainder of Farm 219 (RE/219) was inadvertently cleared outside of the authorised development footprint due to a surveying error. The non-compliance was reported to the Department of Environmental Affairs and Development Planning (DEA&DP), and a Section 24G rectification process was initiated. Specialist input obtained during this process confirmed that the cleared area does not constitute Critically Endangered vegetation, and the Applicant is currently awaiting further guidance from DEA&DP regarding the appropriate regulatory process.

The external environmental audit confirms that the Applicant is largely compliant with the conditions of the EA and the EMPr. The EMPr has proven effective in guiding and mitigating the environmental impacts associated with the construction activities undertaken to date.

No major environmental risks or unmanaged impacts were identified that would warrant triggering a public participation process in terms of Regulation 34(5) of the EIA Regulations. As such, no further public engagement will be undertaken at this stage.

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 'RK' with a stylized flourish.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS



Entrance to the site camp of the R102. Coordinates: 34° 6'10.47"S; 22° 6'51.90"E.



Entrance to the site camp of the R102. Coordinates: 34° 6'10.47"S; 22° 6'51.90"E.



Construction machinery making use of existing hall roads.



Site camp establishment within the previous Swans Nursery footprint.



Fuel bowser available at the site camp on an impermeable surface.



Condition of the Vegetation on the Former Swans Nursery Site



Condition of the Vegetation on the Former Swans Nursery Site



Storage containers located within the newly established site camp.



Indigenous trees planted within the former Swans Nursery for use in site rehabilitation.



Indigenous trees planted within the former Swans Nursery for use in site rehabilitation.



Remaining topsoil stockpiles at the site camp for rehabilitation.



Remaining topsoil stockpiles at the site camp for rehabilitation.



Remaining rescued aloes at the site camp for rehabilitation.



Previous site camp location within RE/219.



Previous site camp location within RE/219.



Previous site camp location within RE/219. Borderline shown to the West.



Retaining wall constructed along RE/219 boundary following unlawful clearing.



R102 being upgraded as per the municipal planning conditions for the construction of the Garden Walk Mall.



R102 being upgraded as per the municipal planning conditions for the construction of the Garden Walk Mall.



R102 being upgraded as per the municipal planning conditions for the construction of the Garden Walk Mall.



R102 being upgraded as per the municipal planning conditions for the construction of the Garden Walk Mall.



Stormwater services being installed along the entrance of the Garden Walk Mall along Monte Christo Rd.



Entrance of the Garden Walk Mall along Monte Christo Rd.



Storage containers are along the retention berm on the eastern boundary.



Service yard and delivery area constructed for retail tenant logistics.



Service yard and delivery area constructed for retail tenant logistics.



Storage and laydown area along the RE/219 boundary and retention wall being rehabilitated.



Storage and laydown area along the RE/219 boundary and retention wall being rehabilitated.



Storage and laydown area along the RE/219 boundary and retention wall being rehabilitated.



Chemical toilets located within the Service yard and delivery area along the eastern and RE/219 boundary.



Service yard and delivery area constructed for retail tenant logistics.



Storage and laydown area along the RE/219 boundary and retention wall being rehabilitated.



Storage and laydown area along the RE/219 boundary and retention wall being rehabilitated.



Storage and laydown area along the RE/219 boundary and retention wall being rehabilitated.



Rehabilitation Phase 3 in progress along the RE/219 boundary, on top of the retention wall.



Rehabilitation Phase 3 in progress along the RE/219 boundary, on top of the retention wall.



Rehabilitation Phase 1 in progress along the RE/219 boundary, on top of the retention wall.



Construction boundary along the R102.



Construction boundary along the R102.



Final construction in progress along the R102.



Installing paving blocks as part of a hard-surfaced area.



Installing paving blocks as part of a hard-surfaced area.



Installing paving blocks as part of a hard-surfaced area.



View of the parking area of the Garden Walk Mall.



Building sand stockpile and bin in place near paving works within the parking area.



Installing paving blocks as part of a hard-surfaced area.



Landscaping of the parking area of the Garden Walk Mall.



Landscaping of the parking area of the Garden Walk Mall.



View of the parking area of the Garden Walk Mall.



Skip in place near paving and cement works.



Bin in place near paving and cement works.



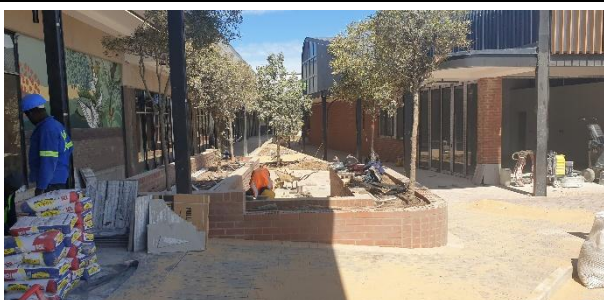
Paving and cement works in progress.



Paving and cement works in progress.



Paving and cement works in progress.



Paving and cement works in progress.



Skip in place near paving and cement works.



Building sand stockpile adjacent to ongoing paving and masonry activities.



Preparing mortar on-site for ongoing paving or masonry activities.



Painting works in progress on the exterior façade of the mall.



Emergency contact information available within the construction area of the mall.



Waste removal truck collecting skips from the construction site.



Skips available along the parking area of the Garden Walk Mall construction area.



Chemical toilets available along the parking area of the Garden Walk Mall construction area.



Chemical toilets available along the parking area of the Garden Walk Mall construction area.



Ground preparation and material handling for paving and drainage works.



Ground preparation and material handling for paving and drainage works.



Empty cement bags collected for disposal.



Construction of the entrance of the mall, paving, and cement works in progress.



Skip available along the parking area of the construction area.



Laydown area adjacent to Burger King.



Chemical toilets available along the parking area of the construction area.



Construction of the entrance of the mall, paving, and cement works in progress.



Completed stormwater services adjacent to the entrance of the site.



Landscaped retaining wall along the entrance of the site.



Stormwater services adjacent to the entrance of the site being installed.



Stormwater services adjacent to the entrance of the site being installed.



Landscaped retaining wall along the R102 boundary of the site.



Stormwater system being installed as part of the R102 upgrade.



View of the constructed side path along the R102.



Landscaped retaining wall along the R102 boundary of the site.



Landscaped retaining wall along the entrance of the site.



Landscaped retaining wall along the entrance of the site.



Green shade cloth screening that was installed around the perimeter of the mall building.



Laydown area adjacent to the eastern boundary.



Laydown area adjacent to the eastern boundary.



Eastern boundary (N2) retaining wall berm with transplanted indigenous trees.



Eastern boundary (N2) retaining wall berm with transplanted indigenous trees.



Eastern boundary (N2) retaining wall berm with transplanted indigenous trees.



Eastern boundary (N2) retaining wall berm with transplanted indigenous trees.



Delivery refuse yard.