

**THE PROPOSED UPGRADE OF THE EXISTING PINNACLE
POINT WASTEWATER TREATMENT WORKS (WWTW)
FROM 2.25 ML/DAY TO 7 ML/DAY TREATMENT CAPACITY
ON THE REMAINDER OF ERF 15390, MOSSEL BAY
REGISTRATION DIVISION, MOSSEL BAY**

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

DEA&DP EIA REF. NO. 16/3/3/1/D6/29/0014/23
NEAS REF. NO. WCP/EIA/0001303/2023



Prepared for:
The Municipal Manager
Mossel Bay Municipality
Private Bag X29
Mossel Bay
6500
Mr. D. Naidoo

Mobile: 082 773 4567
E-mail: dnaidoo@mosselbay.gov.za

Prepared by:
Kapp Environmental Consultants (Pty) Ltd
P.O.Box 121
Mossel Bay
6500
Cell: 082 675 5233

E-Mail: renier@kappec.co.za



KAPPEC

01 April 2026

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	01 April, 2026
Public Review Period	Not Applicable
Report Title	The Proposed Upgrade of the Existing Pinnacle Point Wastewater Treatment Works (WWTW) from 2.25 mL/day to 7 mL/day Treatment Capacity on the Remainder of Erf 15390, Mossel Bay Registration Division, Mossel Bay.
Applicant	The Municipal Manager Mossel Bay Municipality Private Bag X29 Mossel Bay 6500 Mr. D. Naidoo Mobile: 082 773 4567 E-mail: dnaidoo@mosselbay.gov.za
Prepared by	Renier Kapp Kapp Environmental Consultants (Pty) Ltd P.O.Box 121 Mossel Bay 6500 Cell: 082 675 5233 E-Mail: renier@kappec.co.za
	

DISCLAIMER

This report has been prepared on behalf of the Mossel Bay Municipality, represented by Mr. D. Naidoo and is subject to and issued in accordance with the agreement between Kapp Environmental Consultants (Pty) Ltd and WEC-Consult (Pty) Ltd.

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

01 April 2026

Date

CONTENTS

INTRODUCTION.....	7
PROJECT DESCRIPTION	8
LISTED ACTIVITIES	10
CONDITIONS OF AUTHORISATION.....	16
SITE AUDIT FINDINGS	28
<i>Annual environmental audit findings.....</i>	<i>28</i>
<i>Follow-up audit upon completion of rehabilitation findings.....</i>	<i>29</i>
CONCLUSION	41
ANNEXURE A – SITE PHOTOGRAPHS.....	43

LIST OF FIGURES

FIGURE 1: SITE LAYOUT PLAN (WEC CONSULT, DECEMBER 2022)	14
FIGURE 2: SETTING OUT PLAN (WEC CONSULT, JUNE 2023)	15

LIST OF TABLES

TABLE 1: COMPLIANCE RATING	7
TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE	16
TABLE 3: SPECIAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE	26
TABLE 4: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE	31

ABBREVIATIONS

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

APPENDICES

Appendix A:	Site Photographs
Appendix B:	Site Development Plan
Appendix C:	Copy of EA
Appendix D:	Copy of EMPr
Appendix E:	Commencement Notification
Appendix F:	ECO reports
Appendix G:	Method Statements

INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd has been appointed (July 2025) by WEC-Consult (Pty) Ltd on behalf of the Mossel Bay Municipality, represented by Mr. D. Naidoo as the Applicant to undertake the requested annual and final closure external compliance audits in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to the Mossel Bay Municipality on October 31, 2023 (DEA&DP EIA Ref: 16/3/3/1/D6/29/0014/23) in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the Environmental Impact Assessment Regulations, 2014.

This external audit, conducted in alignment with the National Environmental Management Act (NEMA), 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 in fulfilment of Condition 17 contained in the EA.

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
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 Mossel Bay Municipality proposes to upgrade the existing Pinnacle Point Wastewater Treatment Works (WWTW) to address the growing demand for reliable wastewater treatment infrastructure in response to economic development and associated population growth within the municipal area. The project aims to increase the treatment capacity of the WWTW to 6.9 Mega Litres per day (mL/day), ensuring sufficient provision of bulk sanitation services while reducing potential environmental and public health risks linked to pollution.

The proposed upgrade includes both redevelopment within the existing facility footprint and an expansion of the site by approximately 6,000 m² towards the north-west. This expansion, and the activities associated with it, will involve the transformation of land currently zoned as open space and the clearance of indigenous vegetation in line with environmental authorisations.

Key components of the WWTW upgrade include:

- Construction of a new inlet works equipped with mechanical screening, vortex-type grit chambers, and grit and screenings washing systems;
- Installation of a new flow distribution structure to manage the division of influent between the old and new treatment systems;
- Upgrading of existing infrastructure, including refurbishment of the office building to accommodate a new motor control centre (MCC) and the retrofitting of the chlorination building with appropriate safety structures;
- Development of a new secondary treatment chain, comprising a biological reactor and a secondary settling tank;
- Construction of a mechanical dewatering facility and a new dewatered sludge hopper to improve sludge management;
- Rehabilitation of the existing access road and extension of perimeter fencing to secure the entire upgraded footprint.

The project will proceed in two primary phases: a Construction Phase, covering planning, design, and physical development; and an Operational Phase, once the upgraded WWTW is functional. Decommissioning is not envisaged for any of the infrastructure involved in this development.

Although the expansion footprint falls within a sub-quaternary reach (SQR 9292) classified as a Freshwater Ecosystem Priority Area (FEPA) under the National Freshwater Ecosystem Priority Atlas, the development site itself is located well outside the sensitive catchment zone. Notably, while the National Wetland Map 5 identifies a nearby wetland seep, site verification has confirmed that this is a highly disturbed area consisting of rubble and invasive kikuyu grass with no remaining wetland function. Therefore, no direct impact on freshwater ecosystems is expected.

From a biodiversity perspective, a botanical assessment confirms that the site is already significantly degraded due to historical sand mining and the spread of invasive alien species. While some intact Hartenbos Dune Thicket exists nearby, these areas will be demarcated as no-go zones during construction. The anticipated impact on biodiversity is minimal, with no expected loss of important ecological function or occurrence of species of conservation concern, such as butterfly SCCs.

LISTED ACTIVITIES

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

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 clearance of an area of more than 300 m², but less than 6000 m², of indigenous vegetation mapped as an endangered ecosystem, Hartenbos Dune Thicket, and on land that is zoned open space for the upgrading of the Wastewater Treatment Works.

Activity Number: 15

Activity Description:

The transformation of land bigger than 1000 square metres in size, to residential, retail, commercial, industrial or institutional use, where, such land was zoned open space, conservation or had an equivalent zoning, on or after 02 August 2010.

i. Western Cape

i. Outside urban areas, or

ii. Inside urban areas:

(aa) Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010;

- (bb) A protected area identified in terms of NEMPAA, excluding conservancies; or
- (cc) Sensitive areas as identified in an environmental management framework, as contemplated in chapter 5 of the Act, as adopted by the competent authority.

Transformation of more than 1000 m², but less than 6000 m², of undeveloped land that is zoned open space to upgrade the Wastewater Treatment Works.

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

17. 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:

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

17.1.1. 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.

17.1.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority during the validity period and within **three (3) months** of completion of the construction phase.

17.2. Auditing during the operational phase of the facility must comply with the relevant regulatory framework applicable at the time.



FIGURE 1: SITE LAYOUT PLAN (WEC CONSULT, DECEMBER 2022)

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 31 October 2028 (validity period), during which period the Holder must ensure that the— (a) physical implementation of all the authorised listed activities is started with and concluded 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; (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.	DEA&DP was notified of the intended commencement of work on November 28, 2023. Site establishment and construction commenced in January 2024 and progressed within the stipulate timeframe. The ECO submitted monthly monitoring reports to the Competent Authority. Rehabilitation of the stockpile areas, the facility extension, and the surrounding areas commenced in March 2026 and have since been completed. Kapp Environmental Consultants (Pty) Ltd has been appointed (July 2025) by WEC-Consult (Pty) Ltd on behalf of the Mossel Bay Municipality, represented by Mr. D. Naidoo, to undertake the requested annual and final closure external compliance audits in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

		The annual audit inspection was conducted on the 1st of August 2025. The final/completion audit inspection was conducted on the 24th of March 2026. The combined (annual and closure) external environmental audit report will be circulated to all registered I&APs.
2.	The construction phase of the Environmental Authorisation is subject to the following: 2.1 The Holder must finalise the post-construction rehabilitation and monitoring requirements within a period of 3 months from the date the development activity (construction phase) is concluded.	Noted. According to the ECO reports, final paving around the infrastructure and associated construction works was completed in January/February 2026, after which rehabilitation commenced in March 2026. All post-construction rehabilitation activities have now been completed.
3.	The Holder is authorised to undertake the listed activities specified in Section B above in accordance with the Preferred Alternative described in the FBAR dated 9 March 2023 on the site as described in Section C above. This Environmental Authorisation is only for the implementation of the Preferred Alternative which entails: The Holder is herein authorised to undertake the following activities that includes the listed activities as it relates to the clearance of indigenous vegetation and the transformation of land that is zoned as open space for the upgrading of the Wastewater Treatment Works	Noted. All listed activities and the preferred alternative as set forth in the EA was implemented accordingly.

	(WWTW) at Pinnacle Point. The specific details of the proposed upgrading of the WWTW to increase the capacity of the WWTW to 6,9 mL/day involve the following: • construction of a new inlet works with mechanical screening, vortex-type grit chambers and washing of grit and screenings; • construction of a new flow distribution structure between the old and new plants; • upgrading of the existing office building to facilitate the new MCC, further to this the refurbishment of the existing chlorination building to have the required safety structures; • construction of a new secondary treatment chain with a new biological reactor and secondary settling tank; • supply and installation of a new mechanical dewatering facility including the construction of a new dewatered sludge hopper; • rehabilitation of the existing access road; • extension of the site area towards the north-west with a footprint of $\pm 6000 \text{ m}^2$; • extension of fencing around the total footprint. The upgrading of the WWTW must be implemented in accordance with the layout developed by WEC Consult Consulting Engineers (dated December 2022) Drawing number 21-MOS-021/SUR101/00 (Annexure 2).	
4.	This Environmental Authorisation may only be implemented in	Noted. The Environmental Authorisation was implemented in full

	accordance with an approved Environmental Management Programme (“EMPr”).	compliance with the approved Environmental Management Programme (EMPr), which guides all construction and environmental management activities on site
5.	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 remained responsible for all persons acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.
6.	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.
7.	The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 7.1. notify all registered Interested and Affected Parties (“I&APs”) of – 7.1.1. the decision reached on the application; 7.1.2. the reasons for the decision as included in Annexure 3; 7.1.3. the date of the decision; and 7.1.4. the date when the decision was issued. 7.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below;	The I&APs were notified of the EA on the 31 st of October 2023 on the day of the EA being issued.

	7.3. draw the attention of all registered I&APs to the manner in which they may access the decision; 7.4. provide the registered I&APs with the: 7.4.1. name of the Holder (entity) of this Environmental Authorisation, 7.4.2. name of the responsible person for this Environmental Authorisation, 7.4.3. postal address of the Holder, 7.4.4. telephonic and fax details of the Holder, 7.4.5. e-mail address, if any, of the Holder, 7.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended). 7.5. 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. 7.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided (i.e., the listed activities), including site preparation, must not commence until the appeal is decided.	The I&APs were notified of the EA on the 31st of October 2023, and site establishment and commencement only proceeded in January 2024, about 90 days after the notification was sent to the registered I&APs. No appeals were lodged against the EA.
8.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities. 8.1. The notice must make clear reference to the site details and EIA	DEA&DP was notified of the intended commencement of work on November 28, 2023. Site establishment and construction commenced in January 2024, and made clear reference to the site details, EIA Reference, and proof of compliance.

	Reference number given above. 8.2. The notice must also include proof of compliance with the following conditions described herein: Conditions no.: 7 and 12.	Condition 7: The I&APs were notified of the EA on the 31st of October 2023, on the day of the EA being issued. Proof of notification was attached to the commencement notice. Condition 12: HilLand Environmental has been appointed as ECO on the site, dated 28 November 2023, and submits monthly reports. Proof of appointment was attached as Annexure B of the commencement notice.
9.	Seven calendar days' written notice must be given to the Competent Authority on completion of the construction activities.	The ECO notified the Competent Authority of the completion of construction and rehabilitation on 20 March 2026.
10.	The Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented: 10.1. The EMPr must be read with, and implemented together with the following — 10.1.1. All the conditions given in this Environmental Authorisation; 10.1.2. All monthly ECO reports must be submitted to the competent authority; and 10.1.3. Comply with the auditing schedule as set out by this Environmental Authorisation.	Noted and complied with.
11.	The EMPr must be included in all contract documentation for all phases of implementation.	The approved EMPr has been included in the contract documentation.
12.	The Holder must appoint a suitably experienced Environmental	HilLand Environmental has been appointed as ECO on the site,

	Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	dated 28 November 2023, and submits monthly reports.
13.	The ECO must– 13.1. be appointed prior to commencement of any works (i.e. removal and movement of soil); 13.2. ensure compliance with the EMPr and the conditions contained herein; 13.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO; 13.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised; and 13.5. 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, monthly site visits were conducted during the construction phase, and reports were submitted to the Competent Authority.
14.	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.	An environmental file was available on-site and includes all the necessary documentation.
15.	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	Access to the site was permitted via Louis Fourie Rd.

	requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	
16.	The Holder must, for the period during which the environmental authorisation and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.	Kapp Environmental Consultants (Pty) Ltd has been appointed (July 2025) by WEC-Consult (Pty) Ltd on behalf of the Mossel Bay Municipality, represented by Mr. D. Naidoo, to undertake the requested annual and final closure external compliance audits in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). The annual audit inspection was conducted on the 1st of August 2025. The final/completion audit inspection was conducted on the 24th of March 2026. The combined (annual and closure) external environmental audit report will be circulated to all registered I&APs.
17.	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: 17.1. Auditing during the non-operational phase (construction activities): 17.1.1. 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.	Compliant. The annual audit inspection was conducted on the 1st of August 2025.

	17.1.2. 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.	The final/completion audit inspection was conducted on the 24th of March 2026. The external environmental audit report will now be circulated.
18.	The Environmental Audit Report(s), must– 18.1. 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; 18.2. provide verifiable findings, in a structured and systematic manner, on– 18.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 18.2.2. 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. 18.3. identify and assess any new impacts and risks as a result of undertaking the activity; 18.4. evaluate the effectiveness of the EMPr; 18.5. identify shortcomings in the EMPr; 18.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 18.7. indicate the date on which the construction work was commenced with and completed or in the case where the	Kapp Environmental Consultants (Pty) Ltd has been appointed (July 2025) by WEC-Consult (Pty) Ltd on behalf of the Mossel Bay Municipality, represented by Mr. D. Naidoo, to undertake the requested annual and final closure external compliance audits in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). The annual audit inspection was conducted on the 1st of August 2025. The final/completion audit inspection was conducted on the 24th of March 2026. The combined (annual and closure) external environmental audit report will be circulated to all registered I&APs.

	development is incomplete, the progress of the development and rehabilitation; 18.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation; 18.9. include a photographic record of the site(s) applicable to the audit; and 18.10.be informed by the ECO reports	Rehabilitation of the stockpile areas, the facility extension, and the surrounding areas commenced in March 2026 and have since been completed.
19.	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.

ENVIRONMENTAL AUTHORISATION SPECIAL CONDITIONS AND COMPLIANCE

TABLE 3: SPECIAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
20.	The physical alteration of the portion of the Remainder of Erf No. 15390, Mossel Bay, must be restricted to “the site” as depicted on the SDP in Annexure 2. 20.1. No vegetation or land may be disturbed outside the perimeter of the site, unless such activities are authorised by the competent authority. 20.2. Prior to the commencement of the physical implementation of any activities, the site must be clearly demarcated, preferably fenced-off.	Compliant. Physical alteration (construction activity) was limited to the development footprint that was pegged by the surveyor and demarcated with orange netting prior to commencement of excavations.
21.	Should any heritage remains be exposed during excavations or any 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);	No heritage remains were exposed during excavations as per the ECO reports provided.

	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.	
--	--	--

EA Compliance Rating	100%
-----------------------------	-------------

SITE AUDIT FINDINGS

Annual environmental audit findings 1 August 2025

An environmental site audit was conducted on the 1st of August 2025. The site entrance remains in good condition, providing safe and controlled access. Construction of the ring road is currently underway, with levelling, layering, paving, and curbing in progress. Adjacent to the existing inlet works, new inlet works are under construction, and the office building is being upgraded concurrently. A temporary laydown area has been positioned next to the new inlet works, while a parking area is being levelled to accommodate ongoing operations.

At the commencement of construction, stockpiles of topsoil and excavated subsoil were placed within the boundary of the existing parking area. These materials were actively used throughout the construction process and are now undergoing rehabilitation. Although this stockpile area technically lies outside the approved Environmental Authorisation (EA) footprint, it remained within the broader site boundary and posed no exposure or risk to the surrounding natural environment. The Environmental Control Officer (ECO) monitored this activity throughout.

Currently, a centrifugal pump is in operation, dewatering waste from the existing biological reactor into the newly constructed reactor. Appropriate warning signage has been installed around the new reactor. The new clarifier has been completed, while the existing clarifier remains in good condition.

During earlier phases of excavation, stockpiles were temporarily placed adjacent to both the existing and future sludge drying beds. Topsoil still present on site has been neatly stacked in rows and will be used for ongoing rehabilitation. Some alien plant overgrowth was observed and should be cleared as part of site maintenance.

The embankments of the new biological reactor and clarifier have been shaped and graded to reduce erosion risk. However, a stormwater structure still needs to be installed at the corner of the biological reactor embankment to manage surface runoff.

The ECO reports that the top layer of material near the excavation area consists of historically dumped waste material, predating this project. Its unknown composition makes the layer unpredictable, posing a potential stability risk. There is concern that it may collapse or shift beyond the development footprint. A formal request was submitted to the DEA&DP on 2 August 2024 for an on-site assessment. In their response, dated 20 August 2024, DEA&DP emphasized that all construction must remain within the approved development footprint and comply with EA conditions. Any deviations would require prior approval from DEA&DP.

In response to the stability concern, excavation within the disturbed footprint is ongoing to create a bank or bench, designed to catch any slippage from the unstable material. No physical disturbance is permitted outside the development footprint.

The site is well-demarcated, with the surrounding natural area clearly marked by no-go signage and orange safety netting. No environmental disturbance or spillage has been recorded in the adjacent natural areas.

A sufficient number of chemical toilets are available on-site. The site camp is located next to the upgraded office building. Current construction activities include the mechanical dewatering facility and excavation works for the new supernatant pump station. Some sections of the site fencing have collapsed and require reinstatement, particularly around the biological reactor and clarifier. A chalk line has been drawn to guide new fence placement, scheduled for completion within August.

Rehabilitation and stabilisation of the reactor embankment are ongoing, with vegetation being planted as ground cover. All existing site roads are being used as haul roads. Construction of the new RAS pump adjacent to the clarifier is underway, along with the new Secondary Settling Tank (SST) division box.

The existing chlorine channel building is in good condition. However, some exposed electrical wiring was observed on the ground and should be addressed. Snake warning signage has been appropriately displayed throughout the site.

Closure audit upon completion of rehabilitation findings 24 March 2026

A final closure environmental audit was conducted on 24 March 2026 to verify the completion of the authorised works at the Pinnacle Point Wastewater Treatment Works (WWTW) and to assess the progress and implementation of post-construction rehabilitation measures. The audit focused on confirming that all construction activities had been completed in accordance with the Environmental Authorisation and EMPr, and that rehabilitation measures were being implemented appropriately.

Since the previous annual environmental audit conducted in July 2025, substantial progress has been made, and the remaining construction works have been completed. A ClearVu boundary fence has been erected around the WWTW facility, securing the full operational footprint. In addition, the paved access road, internal ring road, and the road adjacent to the newly constructed inlet works have been completed, improving access and operational circulation within the facility.

The new mechanical dewatering facility has been completed, along with the future emergency sludge drying beds. Furthermore, the construction of the biological reactor and clarifier (secondary settling tank) has been finalised. Associated activities, including water testing, backfilling, and shaping of the surrounding areas behind the reactors, have also been completed. The division box and pump station are now fully constructed and operational.

All construction activities associated with the upgrade were completed in February 2026. Thereafter, rehabilitation activities commenced in March 2026, focusing primarily on the stabilisation and revegetation of disturbed areas. The slopes surrounding the newly constructed

biological reactor and clarifier were reshaped, stabilised, and rehabilitated as part of the final rehabilitation phase. Erosion protection and soil stabilisation measures were implemented on these slopes, including the installation of biojute matting pegged into the soil to reduce erosion and promote vegetation establishment.

Rehabilitation and revegetation efforts have been successfully implemented. Disturbed slopes were seeded with an indigenous seed mix consisting of species such as *Dietes iridioides*, *Dietes grandiflora*, *Dietes bicolor*, *Melinis nerviglumis*, *Juncus effusus*, *Searsia crenata*, *Brachylaena discolor*, *Tarchonanthus camphoratus*, and *Dodonaea angustifolia*. Fertiliser was applied to support plant establishment, and vegetation growth was already noted during the final ECO inspection. Invasive alien vegetation within the development footprint was cleared, and a minimum 5 m buffer strip surrounding the site was also cleared of woody alien species as part of the rehabilitation phase. Removed alien vegetation was mulched using a chipper, and the mulch was reused on site.

The rehabilitation phase was completed on 12 March 2026, followed by a final ECO inspection on 19 March 2026, with the final ECO report submitted on 20 March 2026.

According to the Environmental Control Officer (ECO) reports, topsoil that had been stockpiled during construction was reused during the rehabilitation phase. Subsoil used for backfilling was stockpiled within an already disturbed area, specifically within the kikuyu grass parking area, and the area was demarcated with orange safety netting to limit disturbance.

A stormwater and surface water diversion channel has been installed above the clarifier and along the ClearVu fence near the parking area at the WWTW entrance to manage runoff and prevent erosion or uncontrolled stormwater flow.

Overall, the site is largely compliant with the environmental management requirements, and the upgrade infrastructure has been successfully completed. However, during the closure audit it was observed that material stockpiles remain within the proposed parking area, which should be removed and the area levelled to ensure proper site completion. Additionally, minor building materials located at the existing sludge drying beds should be removed to finalise site housekeeping and ensure the area is left in a clean and orderly condition.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 4: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Environmental Awareness	
1.1	All Contractors and subcontractors must attend an Environmental Awareness Training/induction course presented by the ECO, the first of which shall be held before the commencement date. Subsequent courses will be held as needed. The Contractors must induct their staff during toolbox talks.	According to the ECO reports an environmental induction was done on 11 January 2024.
2.	Site Establishment	
2.1	The specific location for the establishment of a construction site, temporary construction camp for the storage of materials, containers, ablution facilities, vehicle turning area, etc. shall be identified in consultation with the ECO, and shall be clearly demarcated, as and where appropriate.	The site camp, including ablution facilities and construction material stockpile areas, was located within the fenced wastewater treatment works (WWTW) facility.
2.2	Stockpile materials only within the designated permanent or temporary stockpile areas as identified by the Project Manager, Consulting Engineer, or ECO.	Subsoil for backfilling was stockpiled within an already disturbed area (kikuyu grass and existing parking area) and demarcated with orange safety netting. The material was later used for backfilling around the clarifier and biological reactor. However, material stockpiles remain within the suggested parking area and should be removed and the area levelled to ensure proper site completion.
2.3	Limit activities to previously cleared areas where possible; restrict vegetation clearance to only what is necessary and indicated.	Construction activities were limited to previously disturbed areas within the approved development footprint. Vegetation clearing was restricted to the development footprint.
2.4	Dispose of cleared vegetation and materials at an appropriately	Invasive alien vegetation removed during construction and

	licensed waste disposal facility—no on-site burning or dumping allowed.	rehabilitation was chipped and mulched on site for reuse during revegetation. No on-site burning or dumping occurred. No other cleared vegetation was disposed of improperly.
2.5	Minimise disturbance to topsoil to reduce the extent of active rehabilitation (e.g. planting) required.	Topsoil was stockpiled within the existing WWTW facility behind the sludge drying beds and was later reused during the rehabilitation and shaping of disturbed areas.
2.6	Do not remove, damage, or disturb flora outside of designated working areas.	All construction activities remained within the approved development footprint, and no disturbance of vegetation outside the demarcated working area was recorded.
2.7	Do not use herbicides or poisonous substances for clearing vegetation under any circumstances.	No herbicides or poisonous substances were used for vegetation clearing; mechanical clearing and hand removal were employed.
2.8	Strictly prohibit trapping, poisoning, or shooting of any animals on or near the construction site.	No trapping, poisoning, or shooting of animals occurred on site. ECO inspections did not report any wildlife incidents.
2.9	Do not deface, damage, mark, or paint any natural features such as rock formations.	Nothing of this sort was observed during the annual or final closure audit.
2.10	Keep the construction camp clean and orderly at all times to maintain site hygiene and reduce environmental impact.	The site camp and surrounding working areas were maintained in a clean and orderly condition during construction. Litter bins were available throughout the site.
3.	Traffic	
3.1	Use existing roads and tracks for all vehicle movement—no new routes may be created.	Existing access roads and site tracks were used and maintained for construction traffic throughout the project.
3.2	Implement traffic safety measures at all entry and exit points, as approved by the Project Manager, Consulting Engineer, and/or Health and Safety Representative.	All construction activities were contained within the WWTW facility boundary, which is a controlled, private site away from public areas and high-traffic roads. No construction vehicles or activities impacted public roads or pedestrian traffic. Existing internal access roads were used and maintained for all vehicle movements, ensuring safe and efficient site circulation.

3.3	Minimise traffic disruption and ensure safety of road users and pedestrians at all times during construction activities.	All construction activities were contained within the WWTW facility boundary, which is a controlled, private site away from public areas and high-traffic roads. No construction vehicles or activities impacted public roads or pedestrian traffic. Existing internal access roads were used and maintained for all vehicle movements, ensuring safe and efficient site circulation.
3.4	Ensure all traffic accommodation measures are properly implemented and maintained throughout the construction phase.	All traffic management measures remained in place and functional throughout construction, as observed by the ECO.
4.	Contaminated Water Control	
4.1	Prevent discharge of effluent or contaminated water from construction activities into the environment—all contaminated water must be collected and disposed of at an appropriate licensed disposal facility.	No contaminated water discharges were noted during site inspections. No pollution incidents were reported to the ECO. Construction water management, including diversion channels above the clarifier and along the ClearVu fence, was in place and functioning effectively as of the final inspection on 19 March 2026.
5.	Site and Waste Management	
5.1	Remove asbestos cement pipelines, if applicable, only through an appropriately certified contractor and dispose of at a licensed facility. Proof of disposal must be kept on site.	No hazardous materials were observed on site during the final audit.
5.2	Store potentially contaminating materials in roofed, impervious areas or double-bag in a skip until removed.	No hazardous materials were observed on site during the final inspection.
5.3	Use lidded waste bins or covered skips for all waste and litter to prevent dispersal by wind or rainwater accumulation.	Closable litter bins were provided at the site camp and throughout the construction site to manage waste and prevent dispersal.
5.4	Store waste in a manner that prevents contamination of stormwater or ground surfaces, especially during rainfall.	Skips were used during the construction phase to store waste temporarily prior to removal. Remaining material stockpiles at the suggested parking area should be removed to finalise site housekeeping.
5.5	Maintain all working, construction, and eating areas in a clean, hygienic, and orderly condition at all times.	Working areas and the construction camp were maintained in a clean condition and general housekeeping was observed to be

		satisfactory.
5.6	Do not excavate or use rubbish pits on site under any circumstances.	No rubbish pits were observed on site.
5.7	Burning of any waste on site is strictly prohibited.	No burning or burying of waste was observed or reported during construction.
5.8	Dispose of hazardous waste, including contaminated soil, used cement bags, and wash water from concrete equipment, at a licensed hazardous waste facility.	All building waste generated during construction was removed from the site.
5.9	Store gas welding and LPG cylinders in a secure, well-ventilated area to avoid safety risks.	Lockable storage containers were used throughout the construction phase for secure storage.
5.10	Prohibit the use of natural water sources for swimming, washing, or cleaning vehicles, machinery, and clothes.	No use of natural water sources for washing, swimming, or cleaning occurred.
5.11	Provide at least one chemical toilet per 15 workers, and ensure all workers use them.	Suitable ablution facilities were available on site throughout the construction phase, as observed during the annual external audit.
5.12	Toilets must be secured to the ground and located at least 40 m from any watercourse or wetland.	Toilets were positioned more than 40 m from watercourses.
5.13	Maintain and clean chemical toilets at least once per week; dispose of sewage at a licensed facility, and retain disposal slips on file.	Toilets were serviced regularly, and disposal slips were retained as per standard procedures.
6.	Hydrocarbon Management	
6.1	Provide proper storage facilities for oils, grease, fuels, chemicals, and other hazardous materials on impermeable surfaces to prevent contamination.	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as required.
6.2	Store fuel in a secure steel tank, supplied and maintained by the fuel supplier, within a bund wall with 110% capacity of the tank volume.	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as required.
6.3	Line bunded areas with impervious material to prevent fuel infiltration into the soil.	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as

		required.
6.4	Dispose of all hydrocarbons and contaminated materials (including soil or wastewater) at a licensed hazardous waste site and retain disposal certificates.	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as required.
6.5	Place drip trays under construction vehicles and equipment that use hydrocarbons, especially when parked overnight.	Drip trays, bunding, and secure storage protocols were implemented as required.
6.6	Inspect and empty drip trays daily; service when necessary and monitor during rain to avoid overflow.	Drip trays, bunding, and secure storage protocols were implemented as required.
6.7	Use a secure, bunded container for used oil storage on site.	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as required.
6.8	Immediately address all hydrocarbon spills to prevent ground infiltration—store environmentally friendly absorbents nearby (e.g., Sunorb, Drizit).	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as required.
6.9	Stop the source of any spill, isolate the affected area to prevent spreading, and rehabilitate the area after clean-up.	No hydrocarbon spills or storage issues were noted. Drip trays, bunding, and secure storage protocols were implemented as required.
7.	Fire Prevention and Control	
7.1	Conduct all welding or heating activities in a controlled environment under strict supervision to minimise fire and injury risks.	No welding activities were observed during the annual or final closure audit.
7.2	Ensure a working fire extinguisher is available at the location of all hot work activities.	Fire extinguishers and safety equipment were in place as per the contractor's method statement and observed during ECO inspections and the annual external audit.
7.3	Provide fire-fighting equipment on site wherever flammable substances are stored or used.	Fire extinguishers and safety equipment were in place as per the contractor's method statement and observed during ECO inspections and the annual external audit.
7.4	Prohibit open fires for any purpose, including heating or cooking,	No open fires or fire remains were observed on site.

	on the construction site.	
7.5	Restrict smoking to designated smoking areas only; no smoking is permitted near or in natural vegetation.	No smoking was noted during ECO inspections. It was recommended that a cigarette disposal bin be provided at the site camp.
7.6	Prohibit the disposal of any materials by burning under any circumstances.	No burning of waste or other materials was observed or reported.
8.	Method Statements	
8.1	Before the contractor(s) begins each construction activity the Contractor and Site Agent shall, prior to the commencement of such activity involving construction, maintenance or rehabilitation, give the ECO a written plan / discuss and approve at site meetings the following: • Site demarcation. • Site and camp layout and establishment. • Stormwater Runoff and Erosion Control. • Earthworks and spoil management.	The following method statements have been provided to the ECO. • Site demarcation. • Site and camp layout and establishment. • Stormwater Runoff and Erosion control. • Earthworks and spoil management. • Location of construction site • Debris silt & other obstructions • Storage of construction materials & hazardous substances • Solid waste • Wastewater • Erosion & sedimentation control • Access to floodplain and watercourse • Water diversion/ drainage • Protection of natural features • Fire control • Cement & concrete batching/on-site mixing • Plastering/ packing • Traffic accommodation • Stockpiling of topsoil • Site rehabilitation

9.	Noise Control	
9.1	Restrict activities generating noise levels of 85dB or more to normal working hours only and prohibit them on weekends to minimise disturbance to neighbours.	No noise issues were noted during site inspections or reported to the ECO.
9.2	Inform affected individuals in advance if construction work must occur outside normal working hours, including Sundays from 07h00 to 17h00.	No after-hours construction was undertaken, therefore no notifications were required.
10.	Dust Control	
10.1	Implement reasonable dust control measures during all construction activities to the satisfaction of the ECO. Contractor is responsible for controlling dust emissions and liable for any damages or costs incurred by the employer due to dust generated from construction operations.	No dust-related issues were noted or reported during the construction period.
11.	Concrete Management	
11.1	Use ready-mix concrete where possible to reduce on-site environmental risks.	Ready-mix concrete was used for bulk construction works.
11.2	Store cement and other potential pollutants in a dry, lockable container to prevent environmental contamination.	Ready-mix cement bags were stored within the site camp in a secure container.
11.3	Conduct all mortar and concrete mixing on an impermeable surface to avoid infiltration into the ground.	Hand mixing of mortar and concrete was conducted on a non-permeable plastic sheet surface.
11.4	Construct lined effluent catchpits at all on-site concrete mixing areas to contain and manage runoff.	Hand mixing of mortar and concrete was conducted on a non-permeable plastic sheet surface.
12.	Natural Vegetation and Alien Clearing	
12.1	Do not disturb sensitive fynbos areas located east of the access road and south-west of the site—declare these areas no-go zones.	Sensitive fynbos east of the access road and south-west of the WWTW was declared no-go and remained undisturbed.
12.2	Demarcate or fence off the construction footprint and restrict all activities, including stockpiling and parking, to already disturbed	The development footprint was clearly demarcated, and construction activities remained within the approved area.

	areas away from natural vegetation.	
12.3	Inform contractors about the ecological sensitivity of surrounding vegetation and ensure they comply with no-go zone restrictions.	Contractors were briefed regarding ecological sensitivity during the environmental induction sessions, and ECO inspections confirmed compliance.
12.4	Salvage topsoil and seed-bearing plant material from fynbos areas that will be disturbed for later rehabilitation use.	Topsoil was salvaged and stockpiled for later use during the rehabilitation phase.
12.5	Rehabilitate and revegetate all disturbed areas, especially new slopes behind the WWTW, using erosion control measures such as silt fences, logs, netting, mulching, and indigenous seeding.	Rehabilitation of disturbed slopes surrounding the biological reactor and clarifier was completed using indigenous vegetation and erosion protection measures, including biojute matting.
12.6	Clear invasive alien plant species (e.g., prickly pear, thorn apple, Australian myrtle, rooikrans, port jackson, lantana) as part of a compulsory long-term invasive species control programme.	Invasive alien vegetation within the development footprint was cleared during the rehabilitation phase.
12.7	Maintain a 5-meter buffer zone around the fenced construction area free of woody alien plants.	A minimum 5 m buffer strip surrounding the site was cleared of woody alien vegetation.
12.8	Monitor rehabilitation success and alien regrowth for at least 24 months after construction.	Ongoing monitoring post-rehabilitation recommended for at least 24 months.
12.9	During site staking, avoid Species of Conservation Concern (e.g., <i>Leucospermum praecox</i>) and protected species like milkwoods (<i>Sideroxylon inerme</i>). Obtain permits from the Department of Forestry if removal is unavoidable.	<i>Leucospermum praecox</i> and milkwoods were avoided.
12.10	Salvage topsoil, cuttings, bulbs, and seedbearing material from affected fynbos for replanting, especially <i>Carpobrotus</i> and <i>Pelargonium</i> species; conduct search and rescue during the wet season for best success.	Topsoil was salvaged and stockpiled for use during the rehabilitation phase. No other search and rescue operations occurred as per the ECO reports.
13. 13.1	Manage and Maintain the Pinnacle Point WWTW and Associated Infrastructure, i.e., Pipelines Ensure rehabilitation and erosion control measures are	Rehabilitation and erosion control measures were implemented

	implemented and maintained to satisfactory standards.	on slopes surrounding the newly constructed infrastructure using soil stabilisation and biojute erosion control matting.
13.2	Maintain successful control of alien vegetation across the site through ongoing monitoring and clearing.	Alien vegetation clearing was undertaken within the development footprint and surrounding buffer strip.
13.3	Implement appropriate wildfire protection measures to adequately safeguard the WWTW infrastructure.	A 5 m-wide cleared fire buffer was established and maintained around the fenced WWTW facility during rehabilitation (March 2026). The buffer is free of woody alien vegetation and provides an effective barrier to mitigate wildfire risk. This fire berm complements the ClearVu boundary fencing to safeguard WWTW infrastructure.
13.4	Ensure the quality of treated wastewater complies with applicable national standards at all times.	Final treated effluent is compliant with national standards.
13.5	Undertake emergency repair work promptly, ensuring that all repair and maintenance activities are environmentally responsible.	Noted, no emergency repair work was necessary.
14.	Rehabilitation and Protection	
14.1	Rehabilitate all previously disturbed and alien-infested areas, using only locally indigenous species and suitable grasses; apply hydroseeding where practical.	Previously disturbed areas were rehabilitated using an indigenous seed mix and topsoil salvaged during construction.
14.2	Monitor all erosion-prone areas, especially after heavy rainfall events, to identify early signs of soil degradation.	Slopes monitored and stabilised; stormwater channels constructed.
14.3	Implement erosion control measures where necessary, and protect all vulnerable areas, including stormwater outlets, using appropriate methods such as silt traps, retaining fences, rock walls, gabions, or mattresses to prevent surface water concentration and slope scouring.	Erosion protection measures were implemented, including slope shaping, soil stabilisation and the installation of biojute erosion control matting.
15.	Protection of Groundwater Resources	
15.1	Take monthly water samples from the maturation dam outlet and	Water sampling from the maturation dam was carried out in

	submit them to an accredited laboratory for chemical analysis. Sampling must be conducted by a qualified Council representative or appointed company.	accordance with Water Use Authorisation by qualified personnel.
15.2	Ensure final treated effluent conforms to the General Limits for wastewater as specified under the National Water Act.	Final treated effluent conforms to General Limits as per the National Water Act.
15.3	Monitor the maturation dam for potential leakage, beginning with an evaporation pan test and followed by regular subsoil seepage inspections.	Maturation dam monitored for leakage; evaporation pan tests and subsoil seepage checks completed.
15.4	Maintain strict and accurate records of all monitoring data for audit purposes.	Monitoring records maintained accurately for auditing purposes.
15.5	Ensure all water monitoring activities comply with the Water Use Authorisation conditions for the facility.	All water monitoring activities conducted in compliance with Water Use Authorisation.

EMPr Compliance Rating	98.91%
-------------------------------	---------------

CONCLUSION

In conclusion, an Environmental Authorisation (EA) was granted to the Mossel Bay Municipality on 31 October 2023 (DEA&DP EIA Ref: 16/3/3/1/D6/29/0014/23) in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the Environmental Impact Assessment Regulations, 2014.

An annual environmental audit was conducted on 1 August 2025, approximately one year after construction commenced. At that time, the audit confirmed that construction activities were generally compliant with the EA and EMPr. Key observations included ongoing construction of the ring road, new inlet works, a mechanical dewatering facility, and associated site infrastructure. Rehabilitation had begun in areas previously disturbed, stockpiles of topsoil and subsoil were managed appropriately, alien vegetation was being controlled, and no contamination or environmental incidents were reported. Some minor issues were noted, including temporary stockpiles outside the immediate construction footprint, incomplete fencing, and areas requiring erosion management.

A final closure environmental audit was conducted on 24 March 2026 to verify the completion of all authorised works and the implementation of rehabilitation measures. The audit confirmed that all construction activities—including the biological reactor, clarifier, division box, pump station, dewatering facility, and associated access roads—have been completed in accordance with the EA and EMPr. Rehabilitation and revegetation of disturbed areas, slope stabilisation, erosion protection, and indigenous planting were successfully implemented, with initial vegetation growth already observed during the final audit. Invasive alien vegetation was cleared, topsoil and subsoil were reused appropriately, and stormwater management measures were installed.

Minor non-compliances remain, specifically material stockpiles within the suggested parking area and minor building materials at the existing sludge drying beds. These items should be removed, and the areas levelled, to ensure proper site housekeeping and completion.

It is recommended that ongoing post-construction monitoring continue for at least 24 months to verify rehabilitation success, monitor buffer zones for alien species regrowth, and ensure erosion control measures remain effective. Monthly water quality monitoring at the maturation dam outlet should also continue in accordance with the Water Use Authorisation to maintain compliance with national standards.

With the completion of these minor actions and continued monitoring, the Pinnacle Point WWTW upgrade can be considered fully compliant with the conditions of the EA and EMPr, with the environmental objectives successfully achieved.

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

Annual Environmental Audit (1 August 2025)



Entrance to the existing WWTW at Pinnacle Point.



Parking area at the entrance of the WWTW. Stockpiles have been placed there and are busy being shaped.



Parking area at the entrance of the WWTW. Stockpiles have been placed there and are busy being shaped.



Parking area towards the existing and new inlet works and biological reactor.



Laydown area located next to the new inlet works.



Parking area towards the natural area, and the embankment of the new biological reactor.



Laydown area located next to the new inlet works.



Natural area adjacent to the parking area and the new biological reactor.



Chalk line indicating the installation of the new fence.



Construction of the new inlet works.



Construction of the new inlet works (cement batching active).



Laydown area and notice boards adjacent to the new inlet works.



Notice board of construction in progress.



Construction of the new inlet works (cement batching active).



Construction of the new inlet works (cement batching active).



Construction of the new inlet works.



Location of the site camp adjacent to the new office building.



Location of the existing sludge drying beds and future emergency sludge drying beds.



Layering of ring road, curbs being installed.



Layering of the ring road, curbs being installed.



Construction of the new mechanical dewatering facility.



Grading and shaping of the slope adjacent to the Ras Pump Station.



Construction of the new super native pump station.



Construction of the new super native pump station.



Exiting fence to be reinstated.



Exiting fence to be reinstated, adjacent to the new mechanical dewatering facility.



Paving of the ring road along the new mechanical dewatering facility.



Notification of an electric cable running along the new mechanical dewatering facility.



Location of the existing sludge drying beds and future emergency sludge drying beds.



Effluent discharge dam.



Location of the existing sludge drying beds and future emergency sludge drying beds with topsoil stockpiles.



Topsoil stockpiles are placed at the back of the future emergency sludge drying beds



Ready mix cement residue adjacent to the ras pump station.



Layering of the ring road, curbing being installed.



Site camp with waste bin and fire equipment in place.



Condition of the site camp.



Laydown area adjacent to the site camp.



Lockable storage container adjacent to the site camp.



Fuel container and generator in place within the lockable storage container.



Existing biological reactor being pumped out.



Existing biological reactor being pumped out.



Existing matter within the existing biological reactor being pumped into the new biological reactor.



Walkway between the existing and new biological reactor.



New Ras Pump Station in between new biological reactor and new clarifier.



Newly constructed clarifier.



Stormwater system installed for redirecting surface runoff.



Shaping and grading of the slopes surrounding the clarifier to be rehabilitated.



Newly installed and activated biological reactor.



Shaping and grading of the slopes adjacent to the new biological reactor.



Orange netting is in place along the natural boundary of the new biological reactor and clarifier.



Orange netting is in place along the natural boundary of the new biological reactor and clarifier.



Orange netting is in place along the natural boundary of the new biological reactor and clarifier.



Historically, waste was dumped at the top of the slope on the northwestern edge of the new biological reactor.



Chalk line indicating the installation of the new fence.



Orange netting is in place along the natural boundary of the new biological reactor and clarifier.



Orange netting is in place along the natural boundary. No-go demarcation in place



Newly constructed clarifier.



Existing clarifier.



A stormwater diversion trench to be formulated.



Existing fence to be reinstated.



Existing chlorine channel and building on site.



Electrical wiring is exposed adjacent to the existing chlorine channel.



Fence wiring scattered around on site.



Dewatering centrifugal pump.



Newly constructed biological reactor.



Slopes surrounding the biological reactor being rehabilitated.

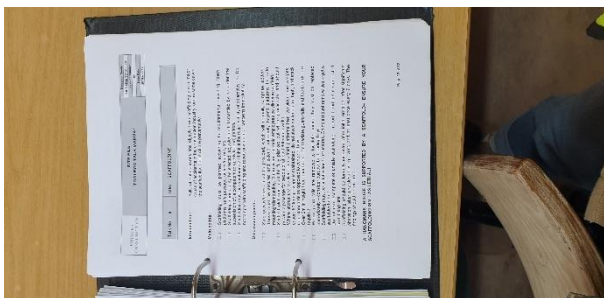


Open areas above the WWTW in good condition.

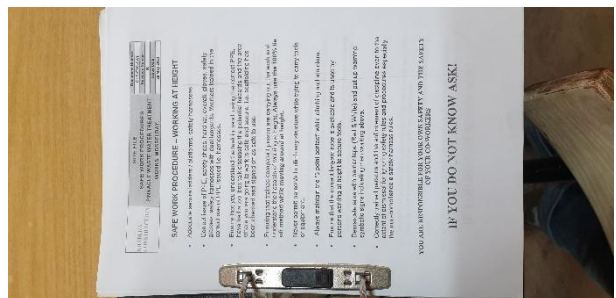


Open areas above the WWTW in good condition.

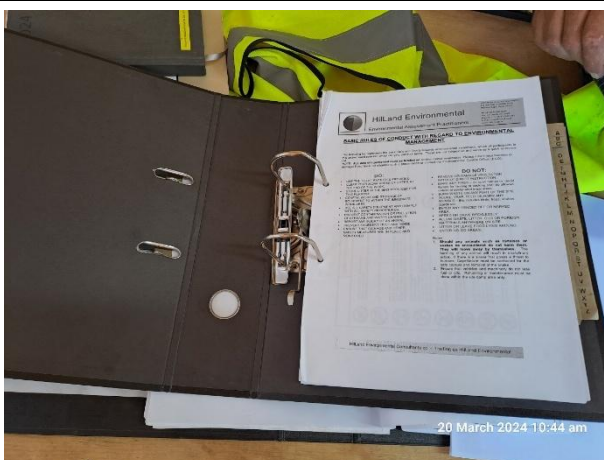
Environmental File



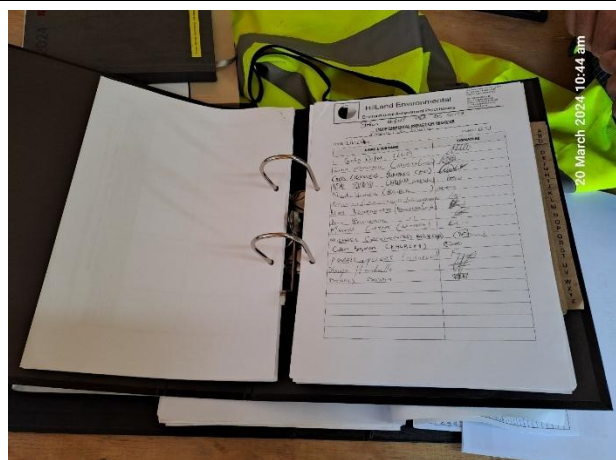
Toolbox Talk Manual.



Working Procedures and Method Statements.



Environmental Induction Do's and Don'ts



Environmental Induction Register.

Final Closure Environmental Audit (Rehabilitation - 24 March 2026)



Parking area at the entrance of the WWTW. Stockpiles have been placed there and should be flattened.



Stormwater/surface water diversion channel created at the entrance of the WWTW.



Stockpiles placed adjacent to the suggested parking area at the entrance of the WWTW to be removed.



Stockpiles placed adjacent to the suggested parking area at the entrance of the WWTW to be removed.



Natural area adjacent to the parking area and the new biological reactor.



Natural area adjacent to the parking area and the new biological reactor.



ClearVu Fence installed surrounding the WWTW plant.



ClearVu Fence installed surrounding the WWTW plant.



ClearVu Fence installed surrounding the WWTW plant.



Newly paved access road to the WWTW.



Newly paved access road to the WWTW.



Newly completed inlet works.



Newly completed inlet works.



Newly completed inlet works.



Rehabilitation of the slopes adjacent to the newly completed biological reactor.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Newly completed inlet works.



Paving works completed adjacent to the newly constructed inlet works.



Newly constructed biological reactor.



Newly constructed biological reactor.



Existing biological reactor.



Rehabilitation surrounding the new Ras Pump Station between the new biological reactor and the new clarifier.



Rehabilitation surrounding the new Ras Pump Station between the new biological reactor and the new clarifier.



Newly constructed Ras Pump Station between the new biological reactor and the new clarifier.



Newly constructed clarifier.



Stormwater/surface water diversion channel created surrounding the newly constructed clarifier.



Rehabilitation of the slopes above the newly constructed clarifier.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Rehabilitation of the slopes surrounding the newly completed biological reactor.



Rehabilitation of the slopes above the newly constructed biological reactor and clarifier.



Rehabilitation of the slopes above the newly constructed clarifier.



Newly constructed clarifier.



Irrigation system installed above the newly constructed clarifier.



Small stormwater diversion channel created above the newly constructed clarifier.



Rehabilitation of the slopes above the newly constructed clarifier.



Stormwater/surface water channel surrounding the clarifier.



Rehabilitation of the slopes above the newly constructed clarifier.



Stormwater/surface water channel surrounding the clarifier.



Existing chlorine channel and building on site.



Finishing a brick valve chamber around pipeline valves



Completed construction of the new super native pump station.



Newly constructed mechanical dewatering facility.



Paving completed of the ring road towards the mechanical dewatering facility.



Existing sludge drying beds.



Newly constructed mechanical dewatering facility.



Single container still located on site.



Building material to be removed adjacent to the existing sludge drying beds.



Single container still located on site.