

THE PROPOSED RIVERBANK MAINTENANCE AT SAN MARINO, ERF 586, KEURBOOMSTRAND, PLETTENBERG BAY.

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

DEA&DP AMENDED EIA REF. NO. 16/3/3/1/D1/6/0014/20
NEAS AMENDED REF. NO. WCP/EIA/0000960/2021



Prepared for:
San Marino Homeowners Association

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KAPPEC

08 May 2026

DETAILS OF THIS REPORT

Status of this Report	Annual Regulation 34 External Compliance Audit Report.
Date Submitted	08 May 2026
Public Review Period	Not Applicable
Report Title	The Proposed Riverbank Maintenance at San Marino, Erf 586, Keurboomstrand, Plettenberg Bay.
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 The logo for KAPP Environmental Consultants features a stylized green leaf and blue water droplet icon to the left of the word 'KAPP' in large, bold, dark grey letters. Below 'KAPP' is the text 'ENVIRONMENTAL CONSULTANTS' in smaller, dark grey, all-caps letters.	

DISCLAIMER

This report has been prepared for the San Marino Homeowners Association, represented by Mr L.Q. van Staden and is subject to and issued in accordance with the agreement with Kappec.

The opinions expressed in this report have been based on the information supplied to KAPPEC by the Client and the relevant Environmental Assessment 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.

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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 Environmental Practitioner

Kapp Environmental Consultants (Pty) Ltd (KAPPEC)

Name of Company

08 May 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:	Locality Map
Appendix C:	Copy of EA
Appendix D:	Copy of EMPr
Appendix E:	Commencement Notification
Appendix F:	ECO reports
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed by the San Marino Homeowners Association, represented by Mr L.Q. van Staden (the Applicant), to undertake an annual external compliance audit for the operational and maintenance phase, in accordance with Conditions 18 and 19 of the Environmental Authorisation (EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

The EA (DEA&DP Ref: 16/3/3/1/D1/6/0014/20) was issued on 14 March 2022 in terms of the National Environmental Management Act, 1998 (Act 107 of 1998).

This audit evaluates compliance with the EA and Environmental Management Programme (EMPr), and the effectiveness of implemented mitigation measures during the operational and maintenance phase.

The audit process included a site inspection conducted on 24 April 2026, a review of relevant documentation, and the compilation and submission of this Environmental Audit Report on 7 May 2026.

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	A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.
GREEN	An item is marked green to indicate complete compliance in line with the EMP.
YELLOW	An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.
ORANGE	An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.
RED	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 project involved the upgrade and rehabilitation of the existing riverbank stabilisation and mooring infrastructure at the San Marino complex, located within the Keurbooms River Estuary. The original timber retaining structures and mooring system, which had deteriorated over time, were replaced with a more environmentally sustainable and stable solution.

The riverbank was re-engineered using a sloping sandbag foundation system covered with reno-mattresses, which were subsequently rehabilitated with indigenous riparian and intertidal vegetation. This approach was implemented to improve long-term structural stability while promoting ecological integration within the estuarine environment. The design aligns with similar riverbank stabilisation measures implemented at adjacent developments, ensuring consistency in erosion control along this section of the river.

In addition, the existing mooring system was upgraded through the installation of a floating jetty structure designed to accommodate multiple vessels. The jetty provides controlled and safer access to boats, reducing the need for direct movement through the intertidal zone and thereby limiting disturbance to sensitive estuarine habitats.

The project was undertaken to address the deterioration of the existing infrastructure, improve erosion control, and enhance the ecological functioning of the riverbank. The incorporation of indigenous vegetation contributes to habitat restoration and supports the natural processes within the estuarine system, while the upgraded mooring infrastructure improves usability and safety for residents.

Construction and rehabilitation activities were completed in 2024, and the site has since transitioned into the operational and maintenance phase. The installed infrastructure is currently in use, and the rehabilitated areas have established successfully, forming part of a stable and functioning riverbank system.

LISTED ACTIVITIES

Environmental Impact Assessment Regulations, 2014 (Listing Notice 1).

Activity No.	Reason for Trigger
12	The proposal will entail the development of floating jetties and the replacement of the current riverbank stabilisation structures that will exceed 100 m ² within the Keurbooms River Estuary.
15	The proposal will entail the development of floating jetties and the replacement of the current riverbank stabilisation structures that exceed 50 m ² within the Keurbooms River Estuary and Coastal Public Property (CPP). The jetty is regarded as falling into the CPP and will provide restricted public access and replace the current moorings and access to moored boats.
17	The proposal will entail the development of floating jetties and the replacement of the current riverbank stabilisation structures that will exceed 50 m ² within the Keurbooms River Estuary.
19	The proposed works will require movement of the existing material in the bank to remove the existing timber walls and then fill the sandbags and install them at the new proposed slope.
19A	The proposed works will require movement of the existing material in the riverbank to remove the existing timber walls and then fill the sandbags and install them at the new proposed slope.
54	The replacement of the vertical timber pole retaining walls with a sandbag and reno-mattress bank protection will see the expansion of the physical footprint of the structures by more than 50m ² .

Environmental Impact Assessment Regulations, 2014 (Listing Notice 3, GN No. 985 of 4 December 2014)

Activity No.	Reason for Trigger
14	The installation of floating jetties and bank stabilisation measures (larger than 10 m ²) on the Keurbooms River to replace the existing moorings.
23	The replacement of the vertical timber pole retaining walls with a sandbag and reno-mattress bank protection will result in the expansion of the physical footprint of the current retaining structure.

REGULATION 34 EXTERNAL AUDIT REQUIREMENTS

This Environmental Audit Report has been prepared in accordance with Regulation 34 of the NEMA EIA Regulations (2014, as amended) and Appendix 7 of Regulation 982. The purpose of the audit is to evaluate compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMPr) during the operational and maintenance phase of the development.

Objective of the environmental audit report

The audit assesses:

- Compliance with the EA conditions and EMPr;
- The effectiveness of mitigation measures implemented;
- Any new environmental impacts or risks arising during the operational and maintenance phase;
- The need for amendments to the EMPr, where applicable.

Additional requirement as per the EA of the environmental audit report

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:

- a) Auditing during the non-operational phase (construction activities):
- During the period which the development activities have been commenced with on site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.
 - 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 post construction rehabilitation and monitoring requirements.

The construction completion environmental audit was compiled by Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) and submitted to the Competent Authority on 06 March 2025 following the site visit conducted on 9 February 2025.

- b) Auditing during the operational phase (post construction and maintenance activities):
- **During the post-construction and maintenance phase, the Holder must ensure annual environmental audit(s) are undertaken following the completion of the construction phase/post construction rehabilitation and monitoring requirements and such Environmental Audit Report(s) must be submitted annually to the Competent Authority.**

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 30 September 2030 .	The EA remains valid. The project is currently within the operational and maintenance phase and within the validity period of the authorisation.
3.	The post-construction and maintenance component (operational phase) of this Environmental Authorisation is granted until 31 March 2030 during which period maintenance to the reno-mattresses and jetties and monitoring requirements and reporting must be finalised. Note: The maintenance monitoring requirements should be completed at least six (6) months prior to expiry of the validity period of an environmental authorisation to ensure the Holder is able to comply with the environmental auditing requirements in time. Failing which, this Environmental Authorisation shall lapse, unless the environmental authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).	Rehabilitation was completed on 25 October 2024 and the site has transitioned into the operational phase. Maintenance and monitoring requirements are ongoing in accordance with the EA.
5.	This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme ("EMPr").	The EMPr has been implemented and remains applicable during the operational phase. Site conditions indicate that mitigation measures remain effective.
6.	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	The Holder continues to take responsibility for compliance with the EA and EMPr during the operational phase.

	Holder.	
7.	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.	No changes or deviations from the authorised scope have occurred during the operational phase.
9.	9. Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities. 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.: 8, 11 and 13. 9.3. Seven calendar days' notice, in writing, must be given to the Competent Authority on the commencement of any maintenance activities to any structures during the period that the environmental authorisation is valid.	No maintenance activities requiring notification have been undertaken since completion of construction and rehabilitation.
17.	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.	Compliance auditing is being undertaken in accordance with the EA requirements.
18.	18. 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: 18.1. Auditing during the non-operational phase (construction	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed by the San Marino Homeowners Association, represented by Mr L.Q. van Staden (the Applicant), to undertake an annual external compliance audit for the

	activities): 18.1.1. During the period which the development activities have been commenced with on site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority. 18.1.2. 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 post construction rehabilitation and monitoring requirements. 18.2. Auditing during the operational phase (post construction and maintenance activities): 18.2.1. During the post-construction and maintenance phase, the Holder must ensure annual environmental audit(s) are undertaken following the completion of the construction phase/post construction rehabilitation and monitoring requirements and such Environmental Audit Report(s) must be submitted annually to the Competent Authority. Note: The final auditing requirements should be completed and submitted at least three months prior to expiry of the validity period of the environmental authorisation to ensure the Holder is able to comply with all the environmental auditing and reporting requirements and for the competent authority to be able to process it timeously.
19. The Environmental Audit Report(s), must– 19.1. 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;	operational and maintenance phase, in accordance with Conditions 18 and 19 of the Environmental Authorisation (EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). A completion (post-construction) audit was conducted on 9 February 2025. The current annual operational audit was conducted on 24 April 2026, in accordance with the EA requirements. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed by the San Marino Homeowners Association, represented by Mr L.Q. van Staden (the Applicant), to undertake an annual external compliance audit for the operational and maintenance phase, in accordance with

	19.2. provide verifiable findings, in a structured and systematic manner, on– 19.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 19.2.2. 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. 19.3. identify and assess any new impacts and risks as a result of undertaking the activity; 19.4. evaluate the effectiveness of the EMPr; 19.5. identify shortcomings in the EMPr; 19.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 19.7. 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; 19.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation; 19.9. include a photographic record of the site applicable to the audit; and 19.10. be informed by the ECO reports.	Conditions 18 and 19 of the Environmental Authorisation (EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). The completion audit was conducted on 9 February 2025, and the current operational audit was conducted on 24 April 2026. The intended physical activities commenced after the 2023 Easter Holiday (11 April 2023). According to ECO reports, construction was completed on 19 March 2024. Rehabilitation was completed on 25 October 2024.
20.	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.

SITE AUDIT FINDINGS

A site inspection and external audit were conducted by Kapepc on the 24th of April 2026. The project has been completed and is currently in the operational and maintenance phase, with the installed infrastructure in use and the riverbank rehabilitation established. The audit focused on compliance with EMPr operational requirements, as well as rehabilitation success and ongoing maintenance needs.

The implemented mitigation measures remain effective, and the site is stable, rehabilitated, and functioning as intended. There have not been any additional activities carried out since the closure of the construction activities.

Infrastructure Condition and Maintenance

The riverbank stabilisation system, including the sandbag and reno-mattress structures, remains stable and intact, with no signs of erosion, undercutting, or structural failure observed. The floating jetty and associated infrastructure are in good condition and fully operational. No damage or maintenance requirements were identified during the audit.

There is no evidence of pollution, littering, or environmental degradation associated with the infrastructure. The site is well-maintained, and no repairs were required at the time of inspection.

Rehabilitation and Vegetation Establishment

Rehabilitation of the riverbank has been successfully implemented. Indigenous vegetation has established across the reno-mattress structures and upper bank areas, contributing to slope stability and ecological integration. Vegetation zonation appears appropriate to the estuarine environment, with salt marsh species established in lower intertidal areas and terrestrial species along the upper bank.

Grass cover has established well, providing effective soil binding. Bush clumps and planted vegetation are present and contributing to habitat creation. No significant areas of vegetation loss, erosion, or exposed reno-mattresses were observed. No alien invasive plant species were noted during the audit, indicating that vegetation management measures are effective.

Monitoring and Operational Compliance

The site appears to be managed in accordance with EMPr operational requirements. The infrastructure and rehabilitated areas are being maintained in a stable condition, and no unauthorised disturbances or activities were observed. There is no indication of damage from usage of the jetty or surrounding areas.

General Compliance Status

Based on the audit findings and confirmation from the ECO, no maintenance activities, environmental incidents, or non-compliances have occurred since the previous audit.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: OPERATIONAL AND MAINTENANCE ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Rehabilitation: Planting of the Riverbank Planting of indigenous plants to create a riparian zone along the reno-mattress construction will add further stability to the banks and improve the general biodiversity and ecological connectivity of the riverbanks.	During the site audit, the riverbank was established with kweek and Kikuyu grass along with yellowwood trees. The reno-mattresses have been successfully revegetated with <i>Tetragonia</i> . <i>Zostera</i> has also been established along the floating jetties.
2.	Vegetation Zonation (Salt Marsh & Riparian) Plant species must align with natural estuarine zonation (salt marsh below high-water mark; terrestrial above)	Vegetation zonation is appropriate, with salt marsh species established in lower intertidal areas and terrestrial vegetation along the upper bank, consistent with the estuarine salinity profile.
3.	Vegetation Establishment & Stability Vegetation must stabilise the slope and prevent erosion.	Vegetation cover is well established across the slope, with no visible erosion or instability observed. The bank is stable and functioning as intended.
4.	No Mowing Zone A no-mow buffer (approx. 2 m from crest) must be maintained except for access.	Grass along the bank is largely maintained, with reduced mowing closer to the water's edge. No negative impacts from mowing practices were observed.
5.	Bush Clump Planting Indigenous trees and shrubs must be planted in clusters to create habitat.	Bush clumps and tree planting are present along the bank.
6.	Alien Vegetation Control Alien invasive species must be removed regularly (every ~3 months)	No alien invasive plant species were observed during the audit.
7.	Reno-Mattress Condition Reno-mattresses must remain covered, stable, and vegetated.	Reno-mattresses are fully covered with vegetation and show no signs of exposure, damage, or displacement.
8.	Erosion Monitoring	No erosion, scouring, or sediment loss was observed. The

	Riverbank must be monitored for erosion, scouring, or material loss.	riverbank remains stable.
9.	Jetty and Infrastructure Condition Jetty and associated infrastructure must be maintained in good condition.	The floating jetty is in good condition, stable, and fully operational, with no visible damage or maintenance requirements.
10.	General Site Condition Site must remain free of pollution, waste, or environmental degradation.	The site is clean and well maintained, with no evidence of littering, pollution, or environmental degradation.
11.	Flood Damage Monitoring Infrastructure must be inspected after flood events and damage repaired.	No flood-related damage was evident at the time of the audit.
12.	Monitoring & Inspections Regular inspections must be conducted and recorded by maintenance staff.	Based on site condition and ECO feedback, the site is being maintained in accordance with EMP requirements, with no issues requiring intervention.

CONCLUSION

Based on the information obtained and the site audit conducted on 24 April 2026, the Holder is compliant with the conditions of the Environmental Authorisation (EA) and Environmental Management Programme (EMPr) applicable to the operational and maintenance phase.

The EMPr is considered adequate and effective in managing and mitigating environmental impacts associated with the completed development. No contradictions between the EA and EMPr were identified.

The audit did not identify any significant non-compliance with the EA or EMPr requirements. No maintenance issues, environmental incidents, or new impacts were observed during the reporting period.

The implemented mitigation measures remain effective, and the site is stable, rehabilitated, and functioning as intended. There have not been any additional activities carried out since the closure of the construction activities.

Based on the findings of this audit, there is no indication of insufficient environmental management or compliance. As such, a public participation process in terms of Regulation 34(5) is not required.

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 'Renier Kapp', written over a light blue grid background.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS



Stormwater outlet channel north of the slipway.



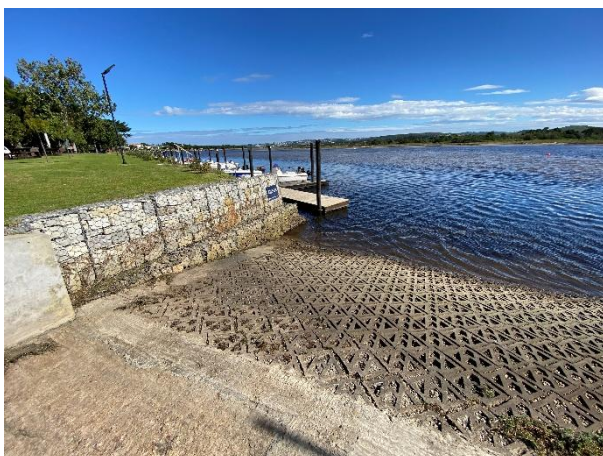
Condition of the stormwater channel outlet into the Keurboom River Estuary towards San Marino.



Condition of the slipway from the roadside.



Condition of the slipway.



Condition of the slipway grassblocks.



Condition of the slipway grassblocks.



The northern end of the jetty showing the completed layers of the reno-matresses and established bank.



The banks and jetty as seen from the north.



Established *Zostera* along the base.



The mooring poles nearest to the slipway as seen towards the north.



Completed jetty showing the gang-plank, jetty and fingers as seen towards the south.



Completed and operational jetty as seen towards the south.



Attached floating jetty and the 4-meter-long by 0.7-meter-wide mooring finger.



Condition of the jetty showing the gang-planks on low tide as seen towards the north.



Reno-mattress toe at the bottom of the riverbank.



Rehabilitation of the riverbank.



Current condition of the rehabilitation riverbank.



Current condition of the rehabilitation riverbank.