



Company Registration No. 2025/774396/07



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EXTERNAL ENVIRONMENTAL AUDIT REPORT

The development of the Herolds Bay Country Estate on a portion of Portion 7 of the farm Buffelsfontein no. 204 in Herold's Bay, George Municipality, Western Cape.

THE HOLDER:

Long Island Trading 44 (Pty)

Mr. Abraham Jacobus Cronje

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AUDITOR:

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DECLARATION OF INDEPENDENCE BY THE AUDITOR

I, Joclyn Marshall of Joclyn Fearon Environmental Services PTY (Ltd), hereby declare that I am suitably qualified and experienced to fulfil the statutory audit requirements, and fully independent of all previous or current work associated with this development, with no affiliations or expectations other than fair remuneration for the services provided under this audit process. I further confirm that I have no financial, personal, or other vested interest in the proposed project, apart from fair remuneration for professional services rendered.

I confirm that I will perform all duties required under the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended), in an objective, impartial, and professional manner.

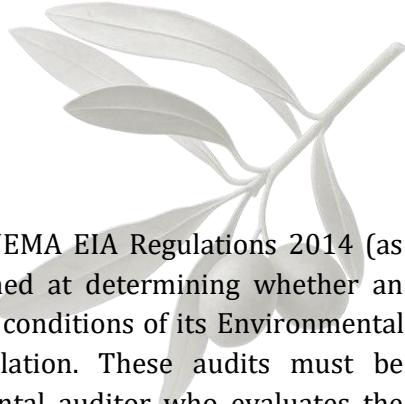
AUDITOR SIGNATURE:

DATE: 30 January 2026

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1. INTRODUCTION



External audits conducted in terms of Regulation 34 of the NEMA EIA Regulations 2014 (as amended in 2017) are formal, independent assessments aimed at determining whether an authorised activity is being carried out in compliance with the conditions of its Environmental Authorisation (EA) and with relevant environmental legislation. These audits must be undertaken by an independent, suitably qualified environmental auditor who evaluates the effectiveness of impact mitigation, adherence to stipulated management plans, and the overall environmental performance of the site or activity. The process includes reviewing documentation, conducting site inspections, interviewing responsible personnel, and compiling a comprehensive audit report that outlines findings, non-compliances, and recommended corrective actions. The audit report must contain information set out in Appendix 7 of the NEMA EIA Regulations 2014 (as amended). The purpose of the audit is to ensure transparency, promote continual improvement, and support the competent authority in monitoring and enforcing environmental compliance.

1.1. The objective of the environmental audit report

The environmental audit report must provide for recommendations regarding the need to amend the EMPr, and where applicable, the closure plan. In accordance with Appendix 7 of the NEMA EIA Regulations 2014, the objective of the environmental audit report is the following:

- (i) Report on the level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan.
- (ii) Report on the extent to which the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan achieves the objectives and outcomes of the EMPr, and closure plan.
- (iii) Identify and assess any new impacts and risks as a result of undertaking the activity.
- (iv) Evaluate the effectiveness of the EMPr, and where applicable, the closure plan.
- (v) Identify shortcomings in the EMPr, and where applicable, the closure plan.
- (vi) Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

1.2. Content of the environmental audit report

An environmental audit report prepared in terms of the NEMA EIA Regulations 2014 must contain the following content:

Requirement	Report Content
a) Details of – i. The independent person who prepared the environmental audit report; and ii. The expertise of the independent person that compiled the environmental audit report.	Annexure 13
b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Section 11
c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Section 2
d) A description of the methodology adopted in preparing the environmental audit report.	Section 3
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 ongoing 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.	Section 5 & 6
f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Section 7
g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Section 8
h) A summary and copies of any comments that were received during any consultation process; and	Section 3 & 8
i) Any other information requested by the competent authority	

2. BACKGROUND

Joclyn Fearon Environmental Services PTY (Ltd) (hereafter referred to as 'JF Environmental Services') was requested by Sharples Environmental Services cc on behalf of the EA Holder, Long Island Trading 44 (Pty) Ltd, to undertake an external environmental audit.

An Environmental Authorisation (16/3/3/1/D2/29/0008/20) was granted on 07 April 2021. An amendment to the Environmental Authorisation was granted on 06 March 2023 with reference number 16/3/3/5/D2/29/0011/22. The following was amended:

1. Condition 10.1.6 in Section E is substituted with the following:

"Incorporate an Operational Phase Environmental Management Plan that will deal with the operational aspects including the filling station and must include:

- (a) Include the implementation plan with clear management outcomes.*
- (b) An indication of the persons who will be responsible for the implementation of the impact management actions.*
- (c) Include all the mitigation measures as described in the Geotechnical Impact Assessment that deals with the filling station and the design measures that were recommended.*
- (d) Include the requirements on the comments provided by the WCG: Department of Environmental Affairs and Development Planning – Pollution and Chemicals Management*
- (e) Include emergency procedures and actions to be undertaken for emergency spills or malfunctioning of tanks.*
- (f) Detail the environmental auditing programme.*

It was communicated by the ECO that a further amendment to the Environmental Authorisation will be submitted to DEA&DP which will propose the exclusion of the filling station, following the finalisation of the external audit. Activities related to the filling station have not yet commenced and therefore will be considered as 'Not Applicable' to this Environmental Audit.

Construction activities commenced in July 2023 and have not yet been completed. Services such as roads, stormwater pipes, and water pipes have been installed. Installation of civil services by Transnet commenced in July 2024. A guard house and show house have been constructed. Installation of the sewage package plant near the show house commenced in September 2024. Rehabilitation has not commenced.

2.1. Project Description

Long Island Trading 44 (Pty) Ltd proposed to build a mixed-use development that combines residential, recreational, and agricultural areas, now known as the Herolds Bay Country Estate. The development features single-family homes, group housing, a filling station with a convenience shop, a neighbourhood center with commercial and office space, and three package plants for onsite sewage treatment.

2.2. Location

Herolds Bay Country Estate is situated on part of Portion 7 of Farm Buffelsfontein No. 204 in Herolds Bay, Western Cape. Herolds Bay is a coastal village along the Garden Route, about 12.5 km southwest of George. The site lies north of the town center and west of the well-known Oubaai Golf Estate, bordered by farmland to the north and west. The total area planned for development is approximately 19.264 hectares.



Figure 1: Portion 7 of Farm Buffelsfontein No. 204 in Herolds Bay, Western Cape.

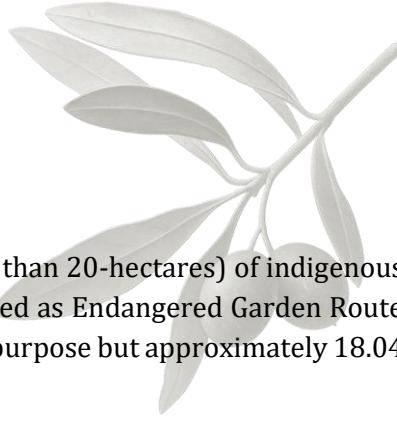
2.3. Scope

The proposal entails the development of a residential estate and business zone on a portion of Portion 7 of the Farm Buffelsfontein 204, Herold's Bay, George. The area where the development will take place is approximately 19 370 square metres in extent. The Holder is authorised to undertake the following activities as per the Environmental Authorisation:

- ❖ A residential area consisting of 102 single residential erven (Single Residential Zone I) and 68 general residential erven (General Residential Zone II);
- ❖ A commercial area comprising of two erven for:
 - a filling station for the storage and handling of a dangerous good (Business Zone II);
 - a convenience centre (Business Zone II);
 - a restaurant (Business Zone II); and
 - office block (Business Zone IV).
- ❖ One open space area (Open Space Zone II) which includes the aquatic buffer;

- ❖ An erf for private road/s (Transport Zone III);
- ❖ An erf for public streets (Transport Zone II);
- ❖ Servitudes registered for the sewerage package plants.

This will require the clearance of more than 1-hectare (but less than 20-hectares) of indigenous vegetation. Also, more than 300 square metres of an area mapped as Endangered Garden Route Granite Fynbos will be cleared of indigenous vegetation for this purpose but approximately 18.04 ha.



In addition, hereto the following associated infrastructure will be constructed:

- ❖ An internal road network with roads of 10 to 26 metres wide
- ❖ Installation of 3 gravity fed package plants for the treatment of sewage and will be situated in three (3) drainage zones
- ❖ The internal sewer network will consist of 160mm pipes with a 110mm connection to each erf.
- ❖ The internal water reticulation system will consist of pipes varying in size between 63 mm and 90 mm diameter with the necessary provision made for isolating valves, pressure reducing valves, fire hydrants, as required and erf connections;
- ❖ Electricity reticulation, substations and street lighting; and
- ❖ Stormwater drainage structures and stormwater pipelines.

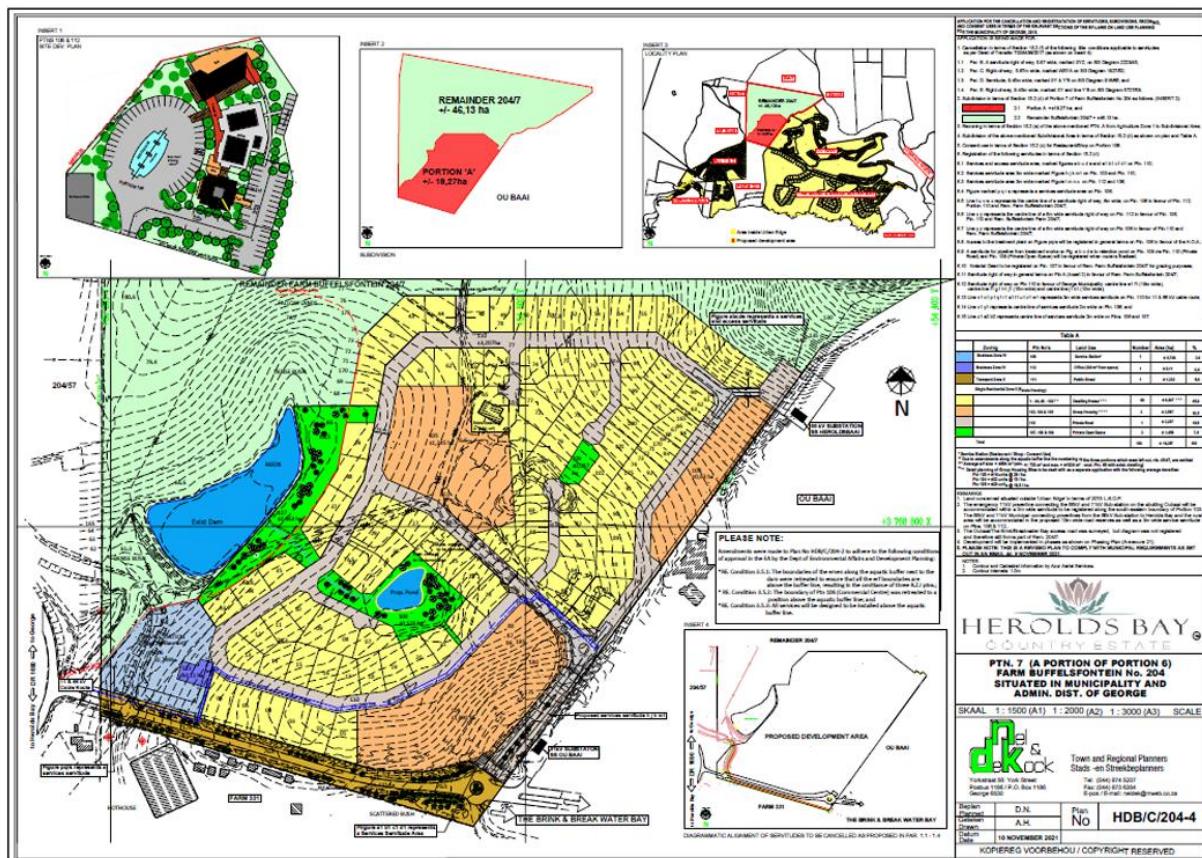


Figure 2: Site development plan as per the EMPr dated April 2023 with reference number CT04/06_DEMPr_11.

Furthermore, a development setback was defined by the Competent Authority, represented by the line described in the Freshwater Habitat Impact Assessment (compiled by Ms Debbie Fordham from Sharples Environmental Services dated 19 March 2019) as an aquatic buffer. The development will be implemented behind the defined development setback line along the non-perennial stream as depicted in figure 3, below.

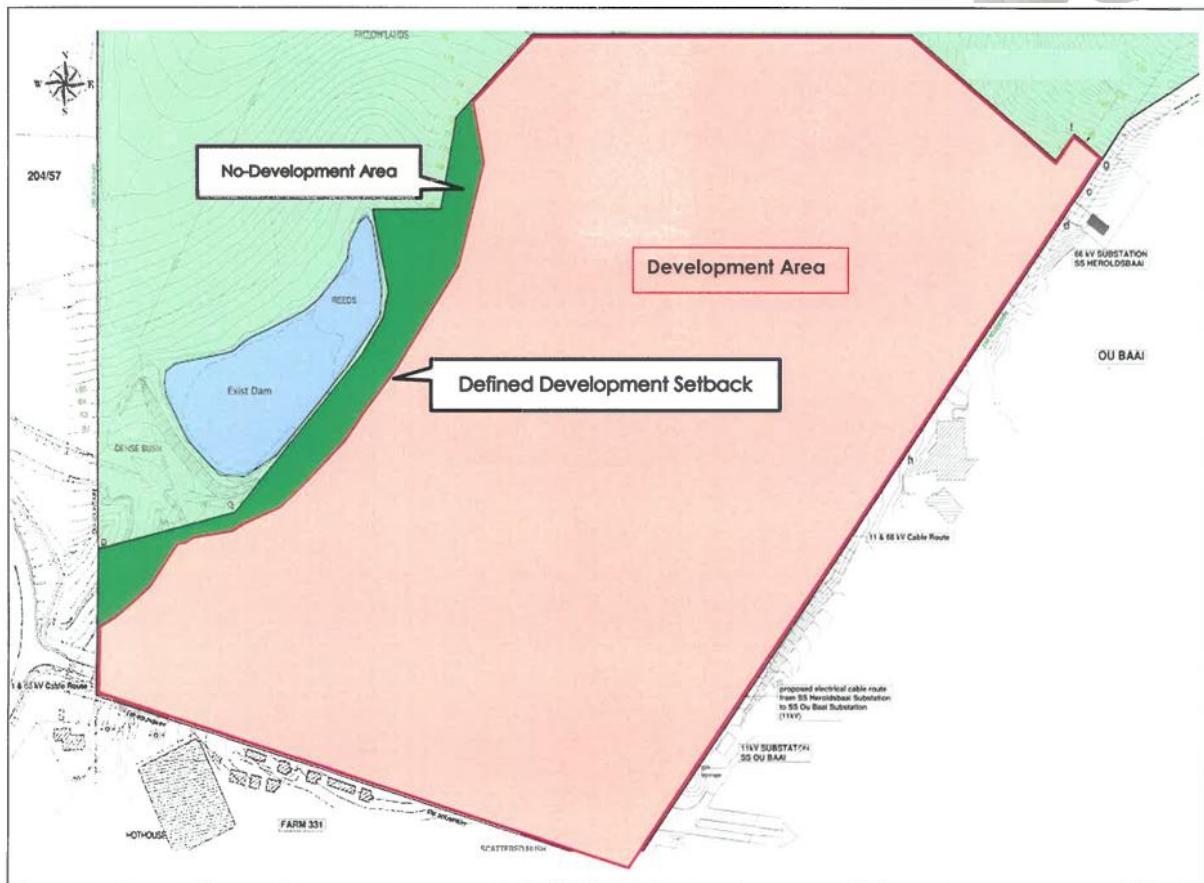


Figure 3: Development setback line as per the Environmental Authorisation, Annexure 2.

3. METHODOLOGY ADOPTED

Sharples Environmental Services cc (SES) provided JF Environmental with all relevant reports, documents and information pertaining to the Herolds Bay Country Estate. The Auditor conducted a site visit on 11 December 2025 with Mr. Christiaan Smit of SES. A photographic record was established to support evidence and findings (Annexure 1). Environmental Monitoring reports were reviewed and a comparative assessment of the management and mitigatory measures carried out. All information provided was methodically reviewed to determine the level of compliance with the EA and EMPr.

Table 1: Key Sources Used in this Audit Report.

Source	Reference No.	Annexure
Environmental Authorisation	16/3/3/1/D2/29/0008/20	2
Environmental Authorisation addendum	16/3/3/5/D2/29/0011/22	2
Amended Environmental Programme	CT04/06_DEMPr_11	3
EMPr for Service Station	24 June 2022	4
Site Development Plan	HDB/C/204-4	5
Site Development Plan - Service Station	1701561/C/G100	4
Environmental Monitoring Reports	6 July 2023 - 27 February 2025	6
Notification of Commencement (SES)	LET/EMP/HB/6/22 LET/EMP/HB/5/23	7
Approval of Amended EMPr	Date 09 May 2023	8
Appointment of ECO	ECO/HB/H/3/22	9
EA Notification	Date 09 April 2021	10
Environmental Awareness	-	11
WWT Plant Operational and Maintenance Manual	July 2024	12

4. LEVEL OF COMPLIANCE

A compliance checklist was developed to evaluate adherence to the conditions outlined in the Environmental Authorisation and Environmental Management Programme. Compliance status is recorded using four categories: Full Compliance, Partial Compliance, Non-Compliance, and Not Applicable.

Full Compliance	Complete adherence to the applicable conditions.
Partial Compliance	Some requirements have been met, although further action is still necessary.
Non-Compliance	Conditions or recommendations have not been met and corrective measures are required.
Not Applicable	Not applicable to this audit, not yet commenced, or still to be completed/started

4.1. Compliance with the Conditions of the Environmental Authorisation

CONDITIONS OF ADDENDUM TO EA (16/3/3/5/D2/29/0011/22)			
No.	Conditions	Compliance	Notes
1	<p>The holder must in writing, within 14 (fourteen) calendar days of the date of this decision-</p> <ul style="list-style-type: none"> 1.1. notify all registered I&APs1 of – <ul style="list-style-type: none"> 1.1.1. the outcome of the application; 1.1.2. the reasons for the decision as included in Section B 1.1.3. the date of the decision 1.1.4. and the date when the decision was issued 1.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of National Appeals Regulations, 2014 detailed in Section D below; 1.3. draw the attention of all registered I&APs to the manner in which they may access the decision; 1.4. provide the registered I&APs with: <ul style="list-style-type: none"> 1.4.1. the name of the holder (entity) of this Environmental Authorisation; 1.4.2. name of the responsible person for this Environmental Authorisation; 1.4.3. postal address of the holder; 1.4.4. telephonic and fax details of the holder; 1.4.5. e-mail address, if any, of the holder; 1.4.6. and the 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 	Full Compliance	<p>The amendment to the EA was granted on 06 March 2023. Notifications sent to I&APs on 08 March 2023 (Annexure 10).</p>

	that an appeal is lodged in terms of the 2014 National Appeals Regulations.		
2	One week's notice must be given to the Directorate: Development Management (Region 3) before commencement of construction activities. The said notice must also include proof of compliance with Condition 1 described in Section C of this Addendum to the Environmental Authorisation.	Full Compliance	See Annexure 7.
3	The conditions contained in the Environmental Authorisation issued on 7 April 2021 under DEA&DP Ref. No. 16/3/3/1/D2/29/0008/20, remain in force.	Full Compliance	

CONDITIONS OF EA (16/3/3/1/D2/29/0008/20)			
No.	Conditions	Compliance	Notes
Scope and Validity Period of authorisation			
1	<p>This Environmental Authorisation is granted for the period from date of issue until 30 April 2041, the date on which all the listed activities, including post-construction rehabilitation and monitoring requirements and operation aspects, will be deemed to be concluded at the site.</p> <p>Further to the above, the Environmental Authorisation is subject to the following:</p> <ul style="list-style-type: none"> 1.1. The non-operational component (i.e. installation of bulk services and top structures and construction of the filling station) is subject to the following: <ul style="list-style-type: none"> 1.1.1. The holder must start with the physical implementation and exceed the threshold of all the authorised listed activities on the site by 30 April 2026. 1.1.2. The development of the facility for the storage and handling of dangerous goods (filling station) must 	Full Compliance	<p>Physical implementation has commenced. The Holder has until 30 April 2026 to ensure all threshold of the authorised listed activities are exceeded.</p> <p>Listing Notice 1: Activity 19 The development of a minor stream which is proposed to join the internal detention pond will require excavation and removal of soil of more than 10 cubic meters from a watercourse. Exceeded.</p> <p>Listing Notice 1: Activity 24 The construction of internal roads within the development of between 10 and 26 meters wide. Exceeded.</p>

	<p>commence by 30 April 2026 and be concluded by 30 April 2028; and</p> <p>1.1.3. Rehabilitation and monitoring must be finalised at the site within a period of 3 months from the date the construction activities (construction phase) are concluded; but by no later than 31 January 2031.</p> <p>1.2. The operational aspects of this Environmental Authorisation are granted until 30 April 2041, during which period all operational aspects, rehabilitation and monitoring requirements as well as the final environmental auditing and reporting must be finalised.</p> <p>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).</p>		<p>Listing Notice 1: Activity 27 The clearance of an area of approximately 18.04 ha of indigenous vegetation for the establishment of the residential development. Exceeded.</p> <p>Listing Notice 1: Activity 28 The development of a residential and mixed development consisting of land developed for use as residential, business and open space areas. The total area of the development is approximately 19.37 ha, single residential erven, group housing units, a filling station, convenience centre, a restaurant and an office block. A total of approximately 30 ha of agricultural land will be irrigated with treated effluent. Exceeded.</p> <p>Listing Notice 3: Activity 4 The construction of roads for the proposed development will be between 10 and 26 metres wide. Exceeded.</p> <p>Listing Notice 3: Activity 10 The construction and related operations of a filling station with combined storage tank size of 69 cubic meters. Not exceeded.</p> <p>Listing Notice 3: Activity 12 The clearance of more than 300m² of Endangered Garden Route Granite Fynbos (approximately 18.04 ha). Exceeded.</p>
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2	<p>The Holder is authorised to undertake the listed activities specified in Section B above in accordance with a part of the Preferred Alternative described in the FBAR dated November 2020 on the site as described in Section C above.</p> <p>The development is limited to the area behind the defined development setback line along the non-perennial stream as depicted in the plan in Annexure 2 of this Environmental Authorisation.</p> <p>The proposal entails the development of a residential estate and business zone on a portion of Portion 7 of the Farm Buffelsfontein 204, Herald's Bay, George. The area where the development will take place is approximately 19 370 square metres in extent and the development will comprise of the following:</p> <ul style="list-style-type: none"> • A residential area consisting of 102 single residential erven (Single Residential Zone I) and 68 general residential erven (General Residential Zone II); • A commercial area comprising of two erven for: <ul style="list-style-type: none"> ○ a filling station for the storage and handling of a dangerous good (Business Zone II); ○ a convenience centre (Business Zone II); ○ a restaurant (Business Zone II); and ○ office block (Business Zone IV). • An open space area (Open Space Zone II) which includes the aquatic buffer; • An erf for private road(s) (Transport Zone III); • An erf for public streets (Transport Zone II); • Servitudes registered for the sewerage package plants. <p>This will require the clearance of more than 1-hectare (but less than 20-hectares) of indigenous vegetation. Also, more than 300 square metres of an area mapped as Endangered Garden Route</p>	Full Compliance	<p>The development has been implemented behind the defined development setback line along the non-perennial stream. See images 19 & 20 of Annexure 1. This line has been demarcated.</p>
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	<p>Granite Fynbos will be cleared of indigenous vegetation for this purpose but approximately 18.04 ha.</p> <p>In addition, hereto the following associated infrastructure will be constructed:</p> <ul style="list-style-type: none"> • An internal road network with roads of 10 to 26 metres wide. • Installation of 3 gravity fed package plants for the treatment of sewage and will be situated in three (3) drainage zones. • The internal sewer network will consist of 160mm pipes with a 110mm connection to each erf. • The internal water reticulation system will consist of pipes varying in size between 63 mm and 90 mm diameter with the necessary provision made for isolating valves, pressure reducing valves, fire hydrants, as required and erf connections; • Electricity reticulation, substations and street lighting, and • Stormwater drainage structures and stormwater pipelines. <p>The development will be implemented behind the defined development setback line along the non-perennial stream as depicted in the plan in Annexure 2 of this Environmental Authorisation.</p>		
3	<p>The holder must adopt and implement the following development restrictions and measures to the proposed development:</p> <p>3.1. No development may take place on the watercourse side of the development setback which has been defined by the competent authority;</p>	Full Compliance	<p>The development has been implemented behind the defined development setback line along the non-perennial stream. This line has been demarcated. See images 19 & 20 of Annexure 1.</p> <p>Plan HDB/C/204-4, submitted to DEA&DP (Annexure 5), reflects the aquatic buffer line.</p>

	<p>3.2. The erf boundaries of all erven (i.e. residential; business; and transport zones) must be setback above the development setback;</p> <p>3.3. All service infrastructure including servitudes, must be set back above the development setback;</p> <p>3.4. The area on the watercourse side of the development setback must form part of the open space system; and</p> <p>3.5. A revised proposal and layout plan reflecting the above restrictions must be submitted to the competent authority for approval prior to site preparation or construction activities commencing on site. The proposed development layout plan must be amended to address the following:</p> <ul style="list-style-type: none"> 3.5.1. The retreat of the erven in the aquatic buffer 3.5.2. The retreat of the service station footprint in the aquatic buffer 3.5.3. All services must be installed directly adjacent to erf boundaries and not encroach the aquatic buffer. 		<p>The revised layout plan for development restrictions and measures to the proposed development as per condition 3 of the EA were submitted to DEA&DP on 26 May 2023. See Annexure 7.</p>
4	<p>This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme ("EMPr").</p>	Full Compliance	<p>The EMPr has been implemented as evident from the Environmental Monitoring reports.</p> <p>Please see EMPr compliance below (Section 4.2).</p>
5	<p>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.</p>	Full Compliance	<p>The Holder has appointed an ECO.</p> <p>The EMPr has been included in all contractual documents and forms part of the Contractors contract with the developer, as communicated by the Holder.</p>

6	<p>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.</p>	Full Compliance	<p>The Holder intends on submitting an application to amend the Environmental Authorisation.</p>
Notification and Administration of appeal			
7	<p>The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision—</p> <ul style="list-style-type: none"> 7.1. notify all registered Interested and Affected Parties (“I&APs”) of – <ul style="list-style-type: none"> 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; 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: <ul style="list-style-type: none"> 7.4.1. name of the Holder (entity) of this Environmental Authorisation, 	Full Compliance	<p>Notifications were sent to I&APs on 09 April 2021. See Annexure 10.</p>

	<p>7.4.2. name of the responsible person for this Environmental Authorisation,</p> <p>7.4.3. postal address of the Holder,</p> <p>7.4.4. telephonic and fax details of the Holder,</p> <p>7.4.5. e-mail address, if any, of the Holder,</p> <p>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).</p> <p>7.5. The listed activities, including the operational activities, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision.</p> <p>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.</p>		
Written Notice to the Competent Authority			
8	<p>Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities.</p> <p>8.1. The notice must make clear reference to the site details and EIA Reference number given above.</p> <p>8.2. The notice must also include proof of compliance with the following conditions described herein: Conditions no.: 3, 7, 10 and 12.</p>	Full Compliance	See Annexure 7.

9	<p>Seven calendar days' notice, in writing, must be given to the Competent Authority on completion of the construction activities of the—</p> <p>9.1. bulk internal service infrastructure (i.e. internal roads; water-, sewer-, electricity reticulation and bulk storm water); and</p> <p>9.2. final phase of the mixed/residential development.</p>	Full Compliance	<p>Although the construction has not been completed, the bulk services have been installed for the first phase, as communicated to the ECO by the Holder as per the EMR dated 27 February 2025. However, the bulk services have not yet been completed for the entire development.</p> <p>As communicated by the Holder, bulk services for the development have been completed partially as necessary to service the completed phases. Internal services have been completed for Phase 2A and 2B.</p>
Management of activity			
10	<p>The draft or Environmental Management Programme (“EMPr”) submitted as part of the application for Environmental Authorisation must be amended and submitted for approval, subject to the following requirements:</p> <p>10.1. The EMPr must be amended to incorporate the following —</p> <p>10.1.1. Environmental Control Officer compliance reports must be submitted monthly to this Directorate.</p> <p>10.1.2. Incorporate all the conditions contained in this Environmental Authorisation; The section dealing with the management and demarcation of the No-Go area's (including the open space areas) must clearly state how the areas will be demarcated prior to any earthworks / commencement of construction;</p>	Full Compliance	<p>The EMPr reflects all conditions, except 10.1.3. - incorporate a map showing the fire breaks as required and an implementation plan for effective fire management.</p> <p>However, the notification letter from SES (Annexure 7) indicates that the risk of fires threatening the development is low, and confirms that the Holder applied to be a member of the Fire Protection Association.</p> <p>A Post Construction Rehabilitation Phase & Operational Phase section has been included in the Amended EMPr.</p> <p>A separate EMPr for the filling station dated 24 June 2022 was compiled by REC Services. A detailed Site Development Plan</p>

	<p>10.1.3. Incorporate a map showing the fire breaks as required and an implementation plan for effective fire management.</p> <p>10.1.4. The revised Site Development Plan must be included in the EMPr;</p> <p>10.1.5. A detailed Site Development Plan for the filling station, which also depicts <i>inter alia</i>:</p> <ul style="list-style-type: none"> a) tank installations and auxiliary infrastructure for the handling of the dangerous goods; b) a site-specific stormwater management / drainage system and separation and/or treatment devices; c) monitoring points including monitoring boreholes; <p>10.1.6. Incorporate an Operational Phase Environmental Management Plan that will deal with the operational aspects including the filling station and must include:</p> <ul style="list-style-type: none"> a) Include the implementation plan with clear impact management outcomes; b) An indication of the persons who will be responsible for the implementation of the impact management actions. c) Include all the conditions and monitoring aspects associated with the groundwater monitoring activities and requirements of the Fuel Retailers Association; d) Include all the mitigation measures as described in the Geotechnical Impact Assessment that deals with the filling station and the design measures that were recommended; e) Include the requirements in the comments provided by WCG: Department of Environmental 		<p>was also compiled for the filling station (Annexure 4).</p> <p>The Amended EMPr was accepted by DEA&DP (Annexure 8).</p>
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	<p>Environmental Affairs and Development Planning – Pollution and Chemicals Management;</p> <p>f) Include emergency procedures and actions to be undertaken for emergency spills or malfunctioning of tanks;</p> <p>g) Detail the environmental auditing programme.</p> <p>Condition 10.1.6 in Section E is substituted with the following:</p> <p>Incorporate an Operational Phase Environmental Management Plan that will deal with the operational aspects including the filling station and must include:</p> <ul style="list-style-type: none"> a) Include the implementation plan with clear management outcomes. b) An indication of the persons who will be responsible for the implementation of the impact management actions. c) Include all the mitigation measures as described in the Geotechnical Impact Assessment that deals with the filling station and the design measures that were recommended. d) Include the requirements on the comments provided by the WCG: Department of Environmental Affairs and Development Planning – Pollution and Chemicals Management. e) Include emergency procedures and actions to be undertaken for emergency spills or malfunctioning of tanks. f) Detail the environmental auditing programme. <p>10.2. The amended EMPr must be submitted to the Competent Authority and be approved, prior to the construction activities commencing on site.</p>		
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	Note: The revised EMPr should be submitted to the Competent Authority at least 90-days prior to the construction activities commencing on site to ensure the competent authority is able to process / review the revised EMPr prior to the intended date of commencement.		
11	The EMPr must be included in all contract documentation for all phases of implementation.	Full Compliance	The EMPr has been included in all contractual documents and forms part of the Contractors contract with the developer, as communicated by the Holder.
Monitoring			
12	The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	Full Compliance	ECO was appointed March 18 2022, as per the date on the ECO Appointment letter (Annexure 9).
13	<p>The ECO must-</p> <ul style="list-style-type: none"> 13.1. be appointed prior to commencement of any works (i.e. removal and movement of soil and/or rubble or construction activities commencing); 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. 	Full Compliance	ECO was appointed before works commenced, and remains employed. All activities are recorded in the monthly Environmental Monitoring Reports.
14	<p>A monitoring programme for the filling station must be developed and implemented which must include the following:</p> <ul style="list-style-type: none"> a) The development of the facility and infrastructure for the storage and handling of a dangerous good (i.e., 	Full Compliance	This is included in the EMPr for the Service Station (Annexure 4).

	<p>construction of the filling station) and must detail the requirements of the fuel containment area, forecourt area, the installation of the underground storage tanks, pipelines;</p> <p>b) Leak detection and monitoring thereof;</p> <p>c) The location of the monitoring boreholes;</p> <p>d) Detail the Recordkeeping and Reporting protocol.</p>		
15	<p>A monitoring programme for the treatment of sewage and disposal of effluent must be developed and implemented which must include the following:</p> <p>a) The sampling frequency of groundwater to detect possible contamination;</p> <p>b) Location of sampling areas;</p> <p>c) Standards that water samples are measured against; and</p> <p>d) Detail the Recordkeeping and Reporting protocol.</p>	Full Compliance	<p>The Wastewater Plant Operational and Maintenance Manual was prepared by Alveo Water, appointed specialists for the Wastewater Plant.</p> <p>Although the manual provides details on monitoring final effluent, further detail is required for monitoring groundwater and sampling points.</p>
16	<p>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.</p>	Full Compliance	ECO file is kept in the site office.
17	<p>Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.</p>	Full Compliance	All documents requested have been forthcoming.
Auditing			
18	<p>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;</p>	Full Compliance	<p>This is the first annual environmental audit report.</p>

19	<p>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:</p> <p>19.1. During the period which the activities have been commenced with on site until the construction of the bulk internal service infrastructure (i.e. internal roads; water-, sewer-, electricity reticulation and bulk storm water) has been completed on site, the Holder must undertake annual environmental audit(s) and submit the Environmental Audit Report(s) to the Competent Authority.</p> <p>A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the construction of bulk internal services and the post construction rehabilitation and monitoring requirements thereof.</p> <p>19.2. During the period the development of the mixed/residential phases (i.e. construction of top structures) is undertaken, the Holder must ensure that environmental audit(s) are performed regularly and submit these Environmental Audit Report(s) to the Competent Authority.</p> <p>During this phase of the development, the frequency of the auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr may not exceed intervals of 5-years.</p> <p>A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the mixed/residential development and the post construction rehabilitation and monitoring</p>	Full Compliance	<p>This is the first annual environmental audit report.</p> <p>Construction commenced July 2023. Rehabilitation has not commenced.</p>
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	<p>requirements thereof, but by no later than 31 January 2031;</p> <p>Note: The final auditing requirements should be completed 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 timely.</p> <p>19.3. During the period the development of the facility or infrastructure for the storage and handling of a dangerous good (i.e. construction of the filling station) is undertaken, the Holder must undertake annual environmental audit(s) and submit the Environmental Audit Report(s) to the Competent Authority.</p> <p>A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the construction of the filling station component of the development and the post construction rehabilitation requirements thereof, but by no later than 30 July 2028.</p> <p>During related operation of the facility or infrastructure for the storage and handling of a dangerous good at the filling station, the frequency of the auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr may not exceed intervals of 5-years.</p> <p>Note: The compilation and submission of the environmental audits can be coordinated so that they can</p>		
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	be compiled and submitted simultaneously to the Competent Authority.		
20	<p>The Environmental Audit Report(s), must –</p> <p>20.1. 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;</p> <p>20.2. provide verifiable findings, in a structured and systematic manner, on –</p> <p>20.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and</p> <p>20.2.2. 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.</p> <p>20.3. identify and assess any new impacts and risks as a result of undertaking the activity;</p> <p>20.4. evaluate the effectiveness of the EMPr;</p> <p>20.5. identify shortcomings in the EMPr;</p> <p>20.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;</p> <p>20.7. indicate the date on which the construction work was commenced with and completed or in the case where the</p>	Full Compliance	Please see declaration of the Auditor, as well as this audit report (Section 1.2).

	<p>development is incomplete, the progress of the development and rehabilitation;</p> <p>20.8. indicate the date on which the operational phase was commenced with and the progress of the rehabilitation;</p> <p>20.9. include a photographic record of the site applicable to the audit; and</p> <p>20.10. be informed by the ECO reports.</p>		
21	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).	Not Applicable	To be undertaken by the Holder on submission of this audit report.
Specific Conditions			
22	Three (3) groundwater monitoring boreholes must be established downgradient of the filling station in order to detect any potential contamination. The positions of the monitoring boreholes must be indicated on the layout plan, once the final design has been confirmed. The monitoring borehole must be established at least 3 months, prior to the installation of the tanks and baseline data must be collected and recorded during this period.	Not Applicable	<p>A layout plan of the positions of the monitoring boreholes was provided (Annexure 4).</p> <p>Groundwater sampling may not be required pending the amendment application whereby the filling station will be replaced.</p>
23	A Site-Specific Stormwater Management Plan must be developed for the filling station site and must detail effective pollution and erosion control measures, as well as stormwater management. This must be submitted and approved by this Department as part of the EMPr, prior to commencement of construction activities.	Not Applicable	Site-Specific Stormwater Management Plan may not be required pending the amendment application whereby the filling station will be replaced.
24	The area on the watercourse side of the development setback must be demarcated as a no-go area and managed for a conservation use.	Full Compliance	This area has been demarcated.

25	The area where treated effluent will be irrigated may only occur on existing and currently used fields as indicated in Annexure 2.	Not Applicable	Irrigation with treated effluent has not yet commenced.
26	The security fencing must be aligned to the perimeter of the development footprint area. The security fencing may not be installed within or around the conservation area, unless approved by the Competent Authority.	Not Applicable	Still to commence according to the Environmental Monitoring Reports
27	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority. Heritage remains include: meteorites; archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.	Full Compliance	According to the Environmental Monitoring Reports, none have been found thus far.

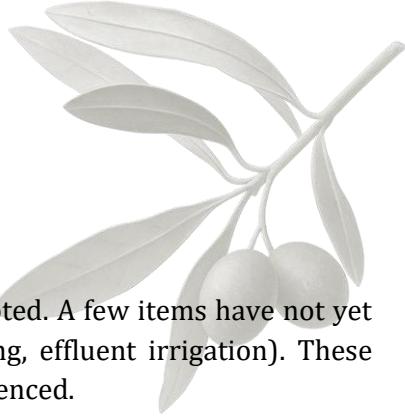
4.2. Compliance with the Environmental Management Programme

CONDITIONS OF AMENDED EMPr (APRIL 2023)			
No.	Conditions	Compliance	Notes
8	General Matters		
8.1	Site access and traffic management	Full Compliance	Development is access controlled.
8.2	Site demarcation		
8.2.1	Construction working area	Full Compliance	No concerns noted.
8.2.2	No-go areas	Full Compliance	Demarcation must be established when construction commences again.
8.2.3	Demarcation of the site camp	Full Compliance	
8.3	Site camp and associated facilities		
8.3.1	Fencing & Security	Full Compliance	Security fencing still to be installed around the development. Development is access controlled.
8.3.2	Fire Fighting Equipment	Full Compliance	
8.3.3	Waste Storage Area	Full Compliance	Waste materials in stockpile areas should be disposed of.
8.3.4	Hazardous Substances Storage Area	Not Applicable	No hazardous substances and fuels are currently being used on site.
8.3.5	Potable Water	Full Compliance	No construction activities were being undertaken at the time of the audit to assess this item. The EMR's do not mention 'Potable Water'. However it is assumed that this item was assessed by the ECO as part of the 'Site Camp and associated facilities'.
8.3.6	Ablution Facilities	Full Compliance	Ablution facilities on site during construction as per EMRs.
8.3.7	Eating Area & Rest Area	Full Compliance	No construction activities were being undertaken at the time of the audit to assess this item. The EMR's do not mention 'Eating Area & Rest Area' being provided.

			However, there were no issues regarding the Site Camp and associated facilities.
8.3.8	Vehicle & Equipment Maintenance Yard	Full Compliance	None on site.
8.3.9	House-keeping	Full Compliance	Needs some tidying up. Recommended that the ECO carry out a site closure inspection.
8.4	Indigenous vegetation clearing	Full Compliance	No concerns noted.
8.5	Topsoil and subsoil management	Full Compliance	Erosion is evident on site – but no serious environmental degradation noted.
8.6	Integrated waste management approach	Full Compliance	Various partial compliance was noted from the EMR – see section 5
8.7	Hazardous substances and fuels	Full Compliance	Some issues noted in ERM during construction – see section 5 below.
8.8	Cement and concrete batching	Full Compliance	Some issues noted in ERM during construction – see section 5 below.
8.9	Erosion control and stormwater management	Partial Compliance	Erosion is evident on site and should be managed.
8.10	Excavations and Earthworks	Partial Compliance	Two excavations that may have occurred after site closure. No ECO on site.
8.11	Heritage Resources	Full Compliance	Monitored, no heritage resources have been found.
8.12	Site closure and rehabilitation	Not Applicable	Site has been temporarily closed, however construction has not been completed.
9	Planning and Design Phase		
9.1	Appoint an Environmental Control Officer	Full Compliance	ECO appointed (Annexure 9).
9.2	Detailed design of the structures and detailed site layout plan	Full Compliance	Submitted to DEA&DP (Annexure 7).
10	Pre-construction Phase		
10.1	Demarcation of no-go areas and working areas	Full Compliance	Establish demarcations when construction commenced.
10.2	Establishment of site camp and associated site facilities	Full Compliance	As per EMR (Annexure 6).
10.3	Pre-construction ECO visit	Full Compliance	See Annexure 11.
11	Construction Phase		
11.1	Prevent soil erosion	Partial Compliance	Erosion is evident on site and should be managed.

11.2	PREVENT POLLUTION AND SOIL/ WATER CONTAMINATION	Full Compliance	Concerns with housekeeping, waste management and cement batching were noted in the EMRs. None observed during inspection.
11.3	Protection of terrestrial ecosystems (fauna and vegetation)	Full Compliance	No concerns noted.
11.4	Alien clearing	Partial Compliance	Lots of wattle saplings establishing on site. These should be removed before they are too big to hand-pull.
11.5	Job creation	Full Compliance	No mitigation required.
11.6	Noise impact management	Full Compliance	No concerns noted.
11.7	Visual impact management	Full Compliance	No concerns noted.
11.8	Dust impact management	Full Compliance	No concerns noted.
12	Post Construction Rehabilitation Phase & Operational Phase		
	Not applicable to this audit	Not Applicable	
13	Emergency Preparedness		
13.1	Emergency response procedures	Full Compliance	
13.2	Emergency preparedness	Full Compliance	
14	Method statements		
		Full Compliance	None were requested by the ECO. No Method Statements provided to the Auditor.
16	Environmental Awareness Plan		
17	Monitoring, Record Keeping and Reporting		
		Full Compliance	The appointed ECO undertook weekly inspections and monthly EMR.

5. SUMMARY OF COMPLIANCE



5.1. Conditions of the Environmental Authorisation

No non-compliance with the Environmental Authorisation was noted. A few items have not yet commenced (security fencing, filling station, borehole monitoring, effluent irrigation). These items would need to be addressed before or once they have commenced.

5.2. Environmental Management Programme

❖ There were several 'partial compliances' related to the conditions of the EMPr noted by the Auditor, as follows:

1. Erosion control and stormwater management – erosion of bare surfaces was observed throughout the site on sloped areas and unpaved roads. This is causing rills and formation of gullies (potential gully erosion). Furthermore, erosion was observed near the wetland tributary (proposed pond and stream) which raises concern of silt runoff into the wetland area.
2. Excavations and earthworks – earthworks appeared to be underway at two separate locations on site. This raises concern as there is currently no ECO monitoring the site.
3. Soil erosion – measures need to be put in place to prevent further degradation and potential gully erosion.
4. Alien clearing – a number of alien invasive plants (mostly black wattle) are emerging across the site. These should be hand-pulled before they become too large. AIP management and monitoring need to be implemented for the site.

The Environmental Monitoring Reports by SES also highlight repeated partial compliances for the items listed below. These issues were dealt with appropriately by the ECO.

1. Integrated waste management – requests for marked bins for recycling.
2. Hazardous substance and fuel – The generators on site not placed on drip trays.
3. Housekeeping – Minor instances of litter on site. Multiple requests for marked bins to be put in place.
4. Cement and concrete management - Minor concrete spills were noted on site.
5. Erosion Control and storm water management – Some erosion was noted on site.

No 'non-compliances' related to the conditions of the EMPr were noted by the Auditor.

6. ABILITY OF EMPr TO SUFFICIENTLY PROVIDE FOR MANAGEMENT AND MITIGATION

The Environmental Management Programme (EMPr) is considered adequate in its ability to provide for the effective management and mitigation of potential environmental impacts associated with the activity. No concerns were identified during the audit that would be likely to result in serious or unacceptable environmental degradation. The Environmental Control Officer (ECO) was observed to be conducting monitoring on a regular basis, with inspections undertaken on a weekly schedule, which is deemed sufficient for the nature and scale of the works. Overall, the EMPr implementation and monitoring measures were found to be appropriate and effective in managing environmental risks.

7. ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

It is presumed that every participant in the process acted with best practices in mind. The Auditor is considered to have received all available evidence, and if any documents or evidence were missing or unattainable, it is assumed they do not exist unless otherwise stated verbally.

At the time of the audit site inspection, all construction activities had been halted. The last Environmental Monitoring Report is dated February 2025. It is assumed that no further construction activities have taken place in the period from February 2025 to the time of the audit without the ECO monitoring the site.

As per EMR dated 27 February 2025 (EMR/HRLDSBY/ CNTRY/PRTN7/02/2025) "*The monitoring site inspection for this report was undertaken on the 4th and 12th of February 2025, following which we were instructed by the EA holder to stop monitoring the site due to the completion of the current phase of activities on site, and monitoring will continue once the next phase of construction commences.*"

8. CONSULTATION PROCESS

Sharples Environmental Services cc were consulted as the appointed Environmental Control Officers. On 11 December 2025, a site investigation was conducted with Mr. Christiaan Smit. This consultation provided substantial information relevant to the project and helped clarify several key points. Furthermore, the EA Holder and Dalmar Beleggings were requested to clarify outstanding points in the audit report.

9. RECOMMENDATION

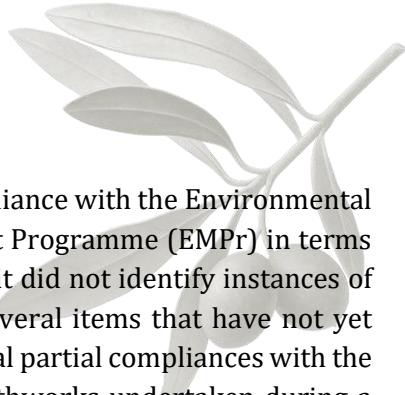


Based on the findings of the audit, and taking into account that the EMPr is generally adequate and that no significant environmental degradation was observed, the following recommendations are made to ensure continued compliance with the Environmental Authorisation and to further strengthen environmental management on site:

1. The Environmental Control Officer (ECO) should undertake a formal site closure inspection to confirm that all environmental management measures are appropriately implemented during the current halting of works. The ECO must be formally notified prior to the recommencement of any construction activities to allow for continued monitoring and oversight.
2. Although a Wastewater Treatment Plant Operational and Maintenance Manual is in place and includes monitoring of final effluent quality, it does not address groundwater monitoring. The programme should therefore be expanded to include groundwater monitoring, specifying the sampling frequency required to detect potential contamination, the location of groundwater sampling points, and the applicable water quality standards against which results will be assessed. This monitoring programme should be implemented prior to the recommencement of operations to ensure ongoing compliance with the Environmental Authorisation.
3. Alien Invasive Plant (AIP) control measures must remain ongoing. Particular attention should be given to the removal and management of emerging black wattle saplings establishing on the property to prevent further spread and potential impacts on indigenous vegetation and sensitive areas.
4. Two excavations observed on site appear to have occurred recently and should be assessed by the ECO to confirm compliance with the EMPr. Where required, appropriate rehabilitation and stabilisation measures should be implemented to prevent erosion, safety risks, or environmental impacts.
5. Areas where erosion has been observed should be addressed as a priority. Suitable erosion control and rehabilitation measures must be implemented, and these areas should be specifically assessed during the site closure inspection to prevent further degradation and potential sediment mobilisation.
6. The drainage line leading towards the dam/wetland area is infested with Alien Invasive Plants and should be subject to targeted clearing and ongoing management. Services installed close to the buffer area have resulted in soil being pushed towards sensitive areas, and erosion has been observed on the slope above the wetland. These areas should be stabilised and rehabilitated to reduce the risk of siltation during periods of heavy rainfall, under the guidance of the ECO.

Implementation of the above recommendations will further enhance environmental protection on site and support continued compliance with the EA, approved EMPr and the principles of the National Environmental Management Act.

10. CONCLUSION



This external environmental audit was undertaken to assess compliance with the Environmental Authorisation (EA) and the approved Environmental Management Programme (EMPr) in terms of the National Environmental Management Act (NEMA). The audit did not identify instances of non-compliance with conditions of the EA, however there are several items that have not yet commenced and would need to be addressed at a later stage. Several partial compliances with the EMPr were noted, primarily associated with erosion control, earthworks undertaken during a period when construction activities were assumed to be halted, soil stabilisation, and Alien Invasive Plant management. These issues, while requiring attention, were not considered to pose a risk of serious or irreversible environmental degradation.

Importantly, no non-compliances with the conditions of the EMPr were recorded, and recurring partial compliance issues identified in Environmental Monitoring Reports were found to have been appropriately addressed by the Environmental Control Officer (ECO) at the time of monitoring. The EMPr itself was assessed as adequate and effective in providing for the management and mitigation of potential environmental impacts, with ECO monitoring conducted at a frequency suitable for the scale and nature of the activities during active construction phases. The audit was undertaken during a period when construction activities had been halted, and it is assumed that no further works occurred without ECO oversight following the cessation of monitoring in February 2025. Consultation with the appointed ECO and the EA Holder provided additional clarity and supporting information relevant to the findings of the audit.

Overall, the site is considered to be generally compliant with the intent of the EA and EMPr, subject to the implementation of the recommendations outlined in this report. Addressing the identified non-compliances and partial compliances, particularly with regard to erosion control, Alien Invasive Plant management, and wastewater monitoring, will be essential to ensure continued compliance and to prevent potential environmental impacts should construction activities recommence.



Company Registration No. 2025/774396/07



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11. STATEMENT OF INDEPENDENCE

I, **Joclyn Marshall**, as the appointed independent specialist hereby declare that I:

- act/ed as the independent specialist in this audit;
- regard the information contained in this report as it relates to this audit to be true and correct;
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2010 and any specific environmental management Act;
- have no vested interest in the proposed activity proceeding;
- have disclosed, to the applicant, EAP and competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the NEMA, the Environmental Impact Assessment Regulations, 2010 and any specific environmental management Act;
- am fully aware of and meet the responsibilities in terms of NEMA, the Environmental Impact Assessment Regulations, 2010 (specifically in terms of regulation 17 of GN No. R. 543) and any specific environmental management Act, and that failure to comply with these requirements may constitute and result in disqualification;
- have provided the competent authority with access to all information at my disposal regarding the audit, whether such information is favourable to the applicant or not; and
- am aware that a false declaration is an offence in terms of regulation 71 of GN No. R. 543.

Signature of the specialist:

Joclyn Fearon Environmental Services (PTY) Ltd

Name of company:

30 January 2026

Date:



Company Registration No. 2025/774396/07



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