

Erf 37121, La Vignia Estate, Kraaifontein: Final Environmental Audit



April 2024

La Vignia Estate Final Environmental Compliance Audit by
Chand Consultants: April 2024

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ABBREVIATIONS

EA	Environmental Authorisation
EMPr	Environmental Management Program
ECO	Environmental Control Officer
DEA&DP	Department of Environmental Affairs & planning
HOA	Homeowners Association
I&APs	Interested and Affected Parties
MSDS	Material Safety Data Sheets
NCR	Non-Conformance Report
NEMA	National Environmental Management Act (No 107 of 1998 as amended)
PM	Project Manager

APPENDICES

Annexure I	Environmental Authorisations and Licenses
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1. INTRODUCTION

1.1 Background to this Report

La Vignia Estate is a housing estate which has been constructed on Erf 37121, Kraaifontein, Cape Town (refer to **Figure 1**). The property is located on the corner of Darwin Road and Mostert Street in Kraaifontein. The site is approximately 3.4479ha with 142 newly constructed residential housing located on the property.

The following conditions stipulated within several authorisations necessitate a Final Environmental Audit to be undertaken:

- Condition 16 of the Environmental Authorisation.
- Section B7.2 Final Environmental Audit of the EMPr.

As such, Chand Consultants (Chand) has been appointed as the Independent Environmental Auditor to undertake the Final Environmental Audit and to compile an Environmental Audit Report.



Figure 1. Site Locality Map (created using Google Earth Pro, May 2024)

1.2 Assumptions and Limitations

The audit is based upon the assumptions that:

1. The findings and observations detailed in this report are based upon visual inspections by the auditors, interviews and scrutiny of documents, and information. The auditors cannot be held responsible for incorrect conclusions drawn as a consequence of being issued with obsolete documents or information being withheld.
2. This audit is not intended to be an assessment of compliance with all environmental legislation. Its focus is on the authorisations under which the facility operates. However, if contraventions of other environmental legislation or legislation which has a bearing on environmental management are noted, this is highlighted.
3. Audits are conducted in terms of the operation phase requirements of the various conditions stipulated within the authorisations/Licenses applicable to the facility.

1.3 Details and Expertise of the Author

TABLE 1: DETAILS OF AUTHOR

Auditor	Chand Consultants
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EAP Qualifications:	BA. Development and Environment (Stellenbosch University)

Taryn Brickhill has a BA in Development and Environment from Stellenbosch University. Her academic history in environmental management gives her key insights in the fields of environmental legislation and compliance. Since joining Chand in June 2022, she has provided essential project support to senior consultants, assisting with report writing and management of specialists and has led the auditing, monitoring and compliance of several developments and construction sites within the Western Cape region.

1.4 Purpose Of This Report

This report details the results of the Final Environmental Audit conducted by Ms. Taryn Brickhill and Ms. Zadrean Fredericks on the 25th of April 2024. This audit was conducted against the EMP_r and EA which was provided by the ECO.

The report is subject to the assumptions and limitations detailed in **Section 1.2** above.

1.5 Scope, Purpose, and Objective of this Audit

The primary objective of the final environmental audit is to provide an overall report on the Contractor's level of compliance with the EMP_r as well as the EMP_r's ability to manage environmental impacts. Please refer to **Table 2** below to view the relevant authorisations/Licenses audited.

TABLE 2. LIST OF LICENSES/AUTHORISATIONS UNDER WHICH THE FACILITY OPERATES

NATURE OF APPROVAL DOCUMENT	DOCUMENT REFERENCE	DATE OF ISSUE	SECTION REFERENCE
Positive Environmental Authorisation: in Terms of The National Environmental Management Act, 1998 (Act 107 of 1998) and The Environmental Impact Assessment Regulations, 2014 (As Amended): Proposed Establishment of The La Vignia Residential Estate and Associated Infrastructure on Erf 37121, Kraaifontein	16/3/3/1/A5/40/2001/19	15/07/2019	Table 4
Amendment of Environmental Authorisation: in Terms of The Environmental Impact Assessment Regulations, 2014 (As Amended) For the Part 1 Amendment of The Environmental Authorisation Used on 15 July 2019 (Referenced: 16/3/3/1/A5/40/2001/19) For The Establishment of The La Vignia Residential Estate and Associated Infrastructure on Erf 37121, Kraaifontein	16/3/3/5/A5/40/2013/21	28/04/2021	Table 4
Environmental Management Programme (Construction and Operational Phase)	N/A	18 December 2018	Table 5

2. AUDIT METHODOLOGY

The following methodology was employed for this external audit.

2.1 Review of Documentation

Initially, the auditor reviewed the Environmental Management Programme and the conditions of the authorisations issued to the facility. This document highlighted the information required from the License holder and key aspects which the auditor would need to observe during the inspection and audit.

2.2 On-site Audit

As mentioned above, the audit was conducted on the 25th of April 2024 by Taryn Brickhill and Zadrean Fredericks (Chand Consultants).

The auditor conducted a walk-through and inspection of the residential estate, addressing each aspect of the process as required. Photographs were taken as evidence.

2.3 Reporting

This includes the compilation of the audit report (this report) based on the information obtained during the audit inspection and subsequent follow-up liaison with the representative of the holder of the EA. An electronic copy of the draft report is issued to the Holder of the EA for review prior to finalization. This allows the representatives to submit any outstanding information.

3. COMPLIANCE

3.1 Compliance Framework

The various documents which authorise the development of the estate contain a range of conditions. They can be broadly divided into different types of conditions:

1. Administrative conditions which detail when reports must be submitted etc.
2. Construction phase requirements; and
3. Operational phase requirements.

While all conditions are important, it is clear that they do not all have the same significance when reviewing compliance or lack thereof, particularly with respect to their impact on the environment.

Experience has shown that the use of a numerical scale to rank compliance and more importantly non-compliance is problematic as it can often result in dispute over the scale and individual scores and does not lead to a comprehensive understanding of the significance of a specific non-compliance in many instances. For this reason, the auditor has chosen to use a system which has been successfully used in other audits which recognises five compliance statuses (refer to **Table 3** and **Figure 2** for an explanation of each).

In addition to the compliance statuses, certain conditions may not require implementation at the time of the audit or items may not have been assessed because certain information was unavailable. These aspects are labelled as "Not Applicable".

Some evidence of compliance was not available at the time of the audit, however, if the auditor was informed of the existence of such documentation and other aspects on site indicated compliance, qualified compliance was allocated. Additionally, in cases where issues identified were in the process of rectification and no imminent harm to the environment is anticipated, qualified compliance was allocated.

TABLE 3 EXPLANATION OF THE FIVE COMPLIANCE RATINGS

Full compliance	All elements of the specific condition have been complied with.
Qualified compliance	This would apply when the holder is not compliant with a specific condition or parts thereof but was in the process of rectifying the non-compliance at the time of the audit. This rating is given if, in the opinion of the auditor , the proposed management actions are likely to result in full compliance on completion. However, since the complete compliance has not yet been achieved, it is only a qualified compliance.

		If the management effort fails, an appropriate non-compliance will be given.
Technical Compliance	Non-	Certain conditions are administrative in nature and even if not complied with will not negatively affect the environment, i.e., a specific time frame for submission of reports. These conditions are termed: "technical conditions". If some elements of a particular technical condition have been complied with but others have not and if the ones which are non-compliant will not result in environmental damage, a partial compliance will be given.
Material Compliance	Non-	If a condition, or part of a condition which could materially affect the environment is not complied with, or if a substantive contravention of other legislation is found, a material non-compliance is given.
Not Applicable		The condition falls outside of the scope of the audit or is not relevant within the operations of the facility.
Not Assessed		The auditor was unable to review compliance with a specific condition as it either falls outside of the scope of the audit or the required information was not provided by the holder of the Authorization.

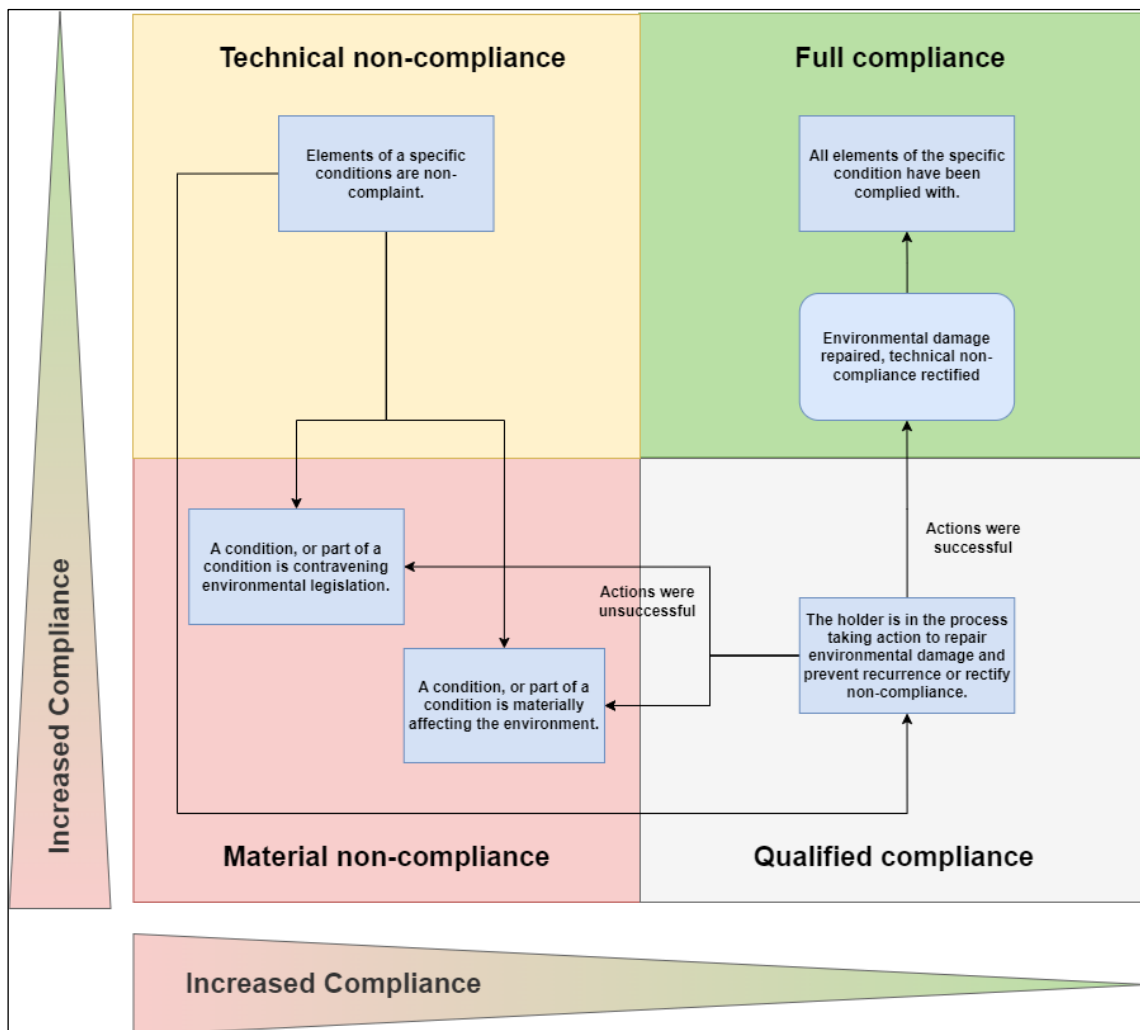


Figure 2: Explanation of Compliance Ratings Used in this Audit Report

3.2 Compliance Checklist

The tables below contain the audit report checklists detailing compliance with the respective conditions of the relevant authorisations/licenses.

Table 4: Positive Environmental Authorisation: GAUT 002/07-08/N1193

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
1.	The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the preferred alternative, described in the DBAR dated 5 April 2019 in the site as described in Section C above.	Full Compliance	The listed activities stated in Section B of the EA includes clearing more than 1-hectare of indigenous vegetation as a result of construction activities and the clearing of more than 300 square meters of Critically Endangered vegetation as a result of construction activities. This was undertaken during the early phases of construction and was carried out on Erf 37121 as stipulated in Section C of the EA.
2.	Authorisation of the activities is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure 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.	Full Compliance	The holder appointed Sillito Environmental Consulting as the ECO to monitor compliance throughout the construction phase. The ECO's appointed for the construction phase included Keegan Goliath, Keziah Ruiters, Charity Hleleni and Darian Kuhn.
3.	The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority. This Environmental Authorisation is granted for – (a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and (b) A period of ten (10) years, from the date the holder commenced with the authorised listed activities for the construction phase, must be concluded.	Full Compliance	The license was issued on the 15 th of July 2019. Construction commenced in August 2021 and concluded in April 2024. All listed activities commenced within five years of the date of issue for the EA and concluded within ten years of the commencement of the listed activity.
4.	The activities that have been authorised must only be carried out at the site described in Section C above in terms of the approved "Environmental Management Programme" ("EMPr").	Full Compliance	The appointed ECO monitored works carried out on site in accordance with the approved EMPr.
5.	Any changes to, or deviations from the scope of the description set out in Section B and Condition 2 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	Not applicable	No changes or deviations to the scope of Section B have been communicated to Chand. It was noted that a Part 1 amendment was undertaken for the EA as a change of ownership was noted. The amendment was accepted by DEA&DP, with an EA amendment being issued on the 28 th of April 2021.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	acceptance/approval or not, the competent authority may request such information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisations in terms of the applicable legislation.		
6.	<p>The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of the decision –</p> <p>6.1. Notify all registered Interested and Affected Parties of –</p> <p>6.1.1.The outcome of the application;</p> <p>6.1.2.The reasons for the decision;</p> <p>6.1.3.The date of the decision; and</p> <p>6.1.4.The date of issue of the decision;</p> <p>6.2. Draw the attention of all registered Interested and Affected Parties to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulation, 2014 (as amended);</p> <p>6.3. Draw the attention of all registered Interested and Affected Parties to the manner in which they may access the decision; and</p> <p>6.4. Provide the registered Interested and Affected Parties with:</p> <p>6.4.1.The name of the holder (entity) to the Environmental Authorisation,</p> <p>6.4.2.Name of the responsible person for this Environmental Authorisation,</p> <p>6.4.3.Postal address of the holder,</p> <p>6.4.4.Telephonic and fax details of the holder</p> <p>6.4.5.E-mail addresses, if any;</p> <p>6.4.6.The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered Interested and Affected Parties in the event that an appeal is lodged in</p>	Full Compliance	<p>6.1. I&APs were notified of the Part 1 amendment made to the EA. Sillito Consulting ensured to include the following information within the notification:</p> <ul style="list-style-type: none"> • The outcome of the application • The reasons for the decision • The date of the decision • The date of issue <p>6.2. The I&APs right to appeal was made clear.</p> <p>6.3. The amended EA was attached to the I&AP notification letter.</p> <p>6.4. All necessary details of the holder as well as contact details of the decision maker has been included.</p>

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	terms of the National Appeals Regulations, 2014 (as amended)		
7.	The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the application notified the registered Interested and Affected Parties of this decision	Full Compliance	A Part 1 amendment was submitted for the EA. I&APs were notified during May 2021 while vegetation clearing commenced in August 2021.
8.	In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the listed activity, including site preparation, until such a time as the appeal has been finalised and the holder is authorised to do so.	Not applicable	No appeals have been communicated to Chand. No suspension was necessary.
9.	A written notice of seven calendar days must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation. 9.1. The notice must make clear reference to the site details and EIA Reference number given above. 9.2. The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7 and 14.	Material Non-Compliance	No proof of communication with the authorities was provided to Chand.
10.	The EMPr submitted, as dated 18 December 2018 is hereby approved and must be implemented.	Full Compliance	The EMPr was implemented by the Client and the Contractors. Compliance was monitored against the EMPr by the appointed ECO.
11.	An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.	Not applicable	No application for EMPr amendments has been communicated to Chand.
12.	The EMPr must be included in all contact documentation for all phases of implementation.	Not Assessed	The auditor did not receive the contract documentation and therefore was not able to assess this requirement.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
13.	A copy of the Environmental Authorisation and the EMPr must be kept at the site where the listed activities will be undertaken. Access to the site referred to in Section C above must be granted and, the Environmental Authorisation and EMPr must be produced to any authorised official representing the competent authority who requests to see these for the purposes of assessing and/or monitoring compliance with the conditions contained herein. The Environmental Authorisation and EMPr must also be made available for inspection by any employee or agent of the application who works or undertakes work at the site.	Material Non-Compliance	No evidence of the EMPr being kept on site was noted by the auditor.
14.	The holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation. The ECO must – 14.1. Be appointed prior to commencement of any land clearing or construction activities commencing; 14.2. Ensure compliance with the EMPr and the conditions contained herein; and 14.3. Keep record of all activities on site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO.	Full Compliance	The holder appointed Sillito Environmental Consulting as the ECO for the project. 14.1. The ECO, Keegan Goliath, undertook the first inspection on the 3 rd of August 2021. Clearing of alien vegetation was underway during the first inspection. 14.2. The ECO monitored compliance with the EMPr, generating a report which noted non-compliances. These non-compliances were that there were no ablution facilities available on site, no provisions had been made for waste management and no dust suppression measures were put in place. 14.3. Record of transgressions were kept in the ECO reports, with a non-compliances table tracking all non-compliances for the project.
15.	The holder must, for the period during which the Environmental Authorisation and the EMPr remain valid – 15.1. Ensure that the compliance with the conditions of the Environmental Authorisation and the EMPr is audited; 15.2. Submit at least two environmental audit reports to the relevant competent authority during the construction phase. The holder must submit one audit report three months after commencement of the construction phase and another audit	Material Non-Compliance	15.1. The holder ensured compliance with the EA and EMPr through the appointed ECO. 15.2. No audit reports or evidence of submission was provided to the auditor. Chand submits this report as the Final Environmental Audit. 15.3. No audit reports or evidence of submission was provided to the auditor.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	<p>report six months after completion of the construction period; and</p> <p>15.3. Submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid</p>		
16.	<p>The environmental audit report must be prepared by an independent person and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended).</p> <p>In addition to the above, the environmental audit report, must –</p> <p>16.1. Provide verifiable findings, in a structured and systematic manner, on –</p> <p>(a) The level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and</p> <p>(b) The extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;</p> <p>16.2. Identify and assess any new impacts and risks as a result of undertaking the activity;</p> <p>16.3. Evaluate the effectiveness of the EMPr</p> <p>16.4. Identify shortcomings in the EMPr;</p> <p>16.5. Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;</p> <p>16.6. 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;</p> <p>16.7. Include a photographic record of the site applicable to the audit; and</p> <p>16.8. Be informed by the ECO reports.</p>	Full Compliance	<p>This report serves as the Final Environmental Audit which is prepared by Chand Consultants. Chand Consultants is an independent entity. The finding of the audit report assesses the level of compliance of the EA and EMPr as well as the mitigation measures provided.</p> <p>No new impacts or risks were noted as the construction phase has now concluded. The effectiveness and shortcomings of the EMPr is highlighted in Table 5 as well as within Section 3.3 below. No changes have been recommended as the construction phase has been completed.</p> <p>Construction commenced during August 2021 and concluded in March 2024.06.04. Photographs have been included in Section 3.3 below. The ECO reports were referenced during the compilation of the audit report.</p>

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
17.	The holder must, within seven days of the submission of the environmental audit report to the competent authority, notify all potential and registered Interested and Affected Parties of the submission and make the report available to anyone on request and, where the holder has such a facility, be placed on a publicly available website.	Not Assessed	The auditor will notify all I&APs on behalf of the holder, with the report being hosted on the website of Chand Consultants. This was not assessed as it has not been undertaken at the time of report compilation.
18.	<p>The following mitigation measures adapted from the BAR dated 5 April 2019 compiled by Johan Neethling of Johan Neethling Environmental Services cc must be implemented:</p> <p>18.1. A conservation area of approximately 1278m* to protect the critically endangered plant species must be established.</p> <p>18.2. Options to reduce waste, water use and electricity consumption must be implemented.</p>	Full Compliance	<p>A conservation area was established in a south-western portion of the site. The area was demarcated during the construction phase with barrier tape. The 3rd Eco report included a photograph depicting sufficient temporary fencing which demarcated the conservation area. Permanent fencing was later established around the area, as noted by the auditor.</p> <p>Options to reduce waste, water use and electricity consumption has been recommended within the EMP. These measures include recycling where possible and solar powered water heating systems. The assessment on whether these measures have been included are noted in Table 5 below.</p>
19.	<p>The mitigation measure adapted from the Botanical Impact Assessment dated May 2017 compiled by Dr David I. McDonald of Bergwind Botanical Surveys & Tours CC must be implemented:</p> <p>19.1. The <i>Aspalathus refroflexa suloicolor</i> plants located on the site (excluding the conservation area) must be searched for and rescued and propagated via seed or cuttings by a qualified horticulturalist. The said plants must be translocated to a suitable receptor site within the Cape Flats Sand Fynbos area of occurrence either within a reserve that currently contains the plant or a site which is likely to have historically contained the species. Comment from the City of Cape Town Environmental Resource Management Department and CapeNature must be obtained regarding a</p>	Material Non-Compliance	The Botanical Impact Assessment was not provided to Chand. No note is made in the ECO reports of the Botanical Impact Assessment being implemented. No search and rescues are noted for the <i>Aspalathus refroflexa suloicolor</i> plants. No comment from the City of Cape Town Environmental Resource Management Department and CapeNature have been provided as proof.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	receptor site deemed suitable.		
20.	<p>The measure adapted from the correspondence from CapeNature dated 18 February 2019 must be implemented:</p> <p>20.1. The Aspolothus retrof/extra sob.blCo/or population within conservation area must be managed as part of the remaining metapopulation of the species. An audit report must be compiled to document the management activities. Copies of all audit reports must be submitted to this Department, the City of Cape Town: Biodiversity Management Branch, South African National Biodiversity Institute and CapeNature.</p>	Not Assessed	This information was not provided to the auditor and therefore cannot be assessed.
21.	The Conservation Management Plan dated April 2019, compiled by Greg Nicolson must be implemented	Technical Non-Compliance	<p>The ECO reports did not note compliance with the Conservation Management Plan, however the following was noted by the auditor during the site inspection:</p> <ul style="list-style-type: none"> • A botanist was not present during the inspection to identify whether invasive alien species and exotic weeds have been removed. • The auditor was not able to determine whether the conservation area was rehabilitated as the auditor was not present at the commencement of the construction phase. No note was made of the specific rehabilitation measures noted within the Conservation Management Plan. • The ECO did not note any search and rescue activities. • No fynbos fires were noted at this stage, however the EA holder is to note that a regular burn cycle of 12-15 years should be implemented. • The conservation area was adequately fenced off. • No sign boards were observed by the auditor. • No walkways were constructed within the conservation areas. • No mention of conservation area monitoring was noted within the ECO reports.
22.	Surface and groundwater must not be polluted due to any actions on the site. The applicable requirements with	Full Compliance	No pollution incidents noted or observed.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	respect to relevant legislation pertaining to water must be met		
23.	An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation	Full Compliance	An integrated waste management approach was implemented by the Contractors. Waste bins and skips were kept on site for the duration of the construction phase. No waste skips were available on the estate during the final environmental audit, however the auditor observed waste rooms containing waste bins.
24.	<p>Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings and graves or unmarked human burials.</p> <p>A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.</p>	Not Applicable	No heritage resources were found for the duration of the construction phase.
25.	Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.	Full Compliance	No statutory non-compliances were recorded by the ECO.
26.	If the holder does not commence with the listed activities within the period referred to in Condition 3, this	Not Applicable	Not applicable as condition three was met.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	Environmental Authorisation shall lapse for the activity, and a new application for Environmental Authorisation must be submitted to the competent authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the competent authority prior to the expiry date of the Environmental Authorisation.		
27.	The holder must submit an application for amendment of the Environmental Authorisation to the competent authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended) must be submitted. Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the competent authority must only be notified of such changes.	Full Compliance	It was noted that a Part 1 amendment was undertaken for the EA as a change of ownership was noted. The amendment was accepted by DEA&DP, with an EA amendment being issued on the 28 th of April 2021.
28.	The manner and frequency for updating the EMPr is as follows: Amendments to the EMPr, other than those mentioned above, must be made in accordance with Regulations 35 to 37 of GN No. R. 982 of 4 December 2014 (as amended) or any relevant legislation that may be applicable at the time	Not Applicable	No amendments to the EMPr noted or communicated to Chand.

Table 5: Environmental Management Programme (Construction and Operational Phase)

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
ROLES AND RESPONSIBILITIES OF MAJOR MANAGEMENT STAKEHOLDERS			

<p>B2.1.1 The Competent Authority</p>	<p>In the Western Cape, the Department of Environmental Affairs and Development Planning (DEA&DP) is the competent authority responsible for issuing Eas in term of NEMA. This authority has overall responsibility for ensuring that the Developer complies with the conditions of its EA as well as this EMPr, once approved.</p> <p>During the construction and operational phases of the EMPr the Competent Authority will have the following role to play:</p> <ul style="list-style-type: none"> • Conduct ad hoc compliance inspections. • Read the ECO's monitoring reports and take action as deemed necessary. • Provide assistance and guidance in understanding and meeting the specified requirements. • Enforcing compliance by the Developer. 	<p>Not Assessed</p>	<p>This was not assessed by the auditor. No proof of ad hoc compliance inspections or communications from the authorities was provided to Chand.</p>
<p>B2.1.2 The Developer</p>	<p>The Holder of the Environmental Authorisation (the Developer) is accountable for the potential impacts of the activities that are undertaken and is responsible for managing these impacts during the construction phase of the project.</p> <p>The Developer therefore has overall and total environmental responsibility to ensure that the EMPr is implemented and that both the EMPr and the EA are complied with at all times. The Developer is also responsible for ensuring that all other environmental related legislation is complied with.</p> <p>Amongst the general responsibilities above, the Developer is also responsible for:</p> <ul style="list-style-type: none"> • Appointing an ECO, and where required an environmental auditor. • It is the Developer's responsibility to notify DEA&DP within 24 hours of an occurrence of any non compliance with the EA, EMPr. • Take the necessary action in terms of non-compliances. • Ensuring that all of the Developer's, staff, 	<p>Full Compliance</p>	<p>The developer has ensured compliance through the following items:</p> <ul style="list-style-type: none"> • The developer has appointed Sillito Environmental Consulting as the ECO for the site. • Chand has not been informed of any DEA&DP notifications made by the developer regarding non-compliances. • Non-compliances were generally dealt with in a timeous fashion. • The developer ensured compliance through ECO monitoring. • To the knowledge of Chand, all necessary authorisations and permits have been obtained. • The ECO's recommendations were made through ECO reports. Non-compliances were generally dealt with in a timeous fashion.

	<p>representatives, contractors, consultants and any other agent operating under the Employ of the Developer comply with the EA, EMPr and any other environmental legislation.</p> <ul style="list-style-type: none"> • Ensuring that all the necessary authorisations and permits have been obtained. • Considering the ECO's observations and recommendations, and taking action where required. 		
<p>B2.1.3 The Project Manager</p>	<p>The Project Manager is the Developer's on-site implementing agent and has the responsibility to ensure that the Developer's responsibilities are executed in compliance with relevant legislation and the EA.</p> <p>Any on-site decisions/inputs regarding environmental management are ultimately the responsibility of the PM. The Project Manager has the authority to stop works if in his/her opinion there is a serious threat to or impact on the natural and/or social environment as a result of the construction operations.</p> <p>The PM will have the following responsibilities in terms of the implementation of the Construction phase of this EMPr and assisting the Developer to ensure compliance with the EA, EMPr and any other environmental legislation:</p> <ul style="list-style-type: none"> • Ensure that the specifications as outlined in the CEMPr are adhered to. • Ensuring, in conjunction with the Developer, that the authorisations and permits have been obtained and conditions have been met. • Ensure giving 7 day's prior notice to DEA&DP of commencement of the project. • Ensuring that the Developer is aware of any environmental non-compliance on site. • Considering the ECO's observations and 	<p>Technical Non-Compliance</p>	<p>To the knowledge of the auditor, no works have been stopped due to non-compliances for the duration of the project. The following was implemented by the PM:</p> <ul style="list-style-type: none"> • Ensuring that CEMP specifications were adhered to was implemented through the ECO and recommendations made within the ECO reports. • To the knowledge of the auditor, all necessary authorisations and permits were obtained. The authorisations and permits were obtained prior to the commencement of construction. • No proof of a commencement notice being provided to DEA&DP was given to the auditor. • The developer was made aware of non-compliances through the ECO reports. • Non-compliances were generally dealt with in a timeous manner. • No proof of the PM reviewing and approving the Contractor's method statements have been provided. • No fines or penalties were issued for the duration of the construction phase.

	<p>recommendations and take action in regard to any non-compliance that is reported on or noted.</p> <ul style="list-style-type: none"> • Reviewing and approving the Contractor's method statements. • Ensure that the ECO is provided with any documentation required from the project team or contractors. Ensuring that the ECO is made aware of any changes in terms of the project. • Issuing fines and penalties for transgressions and contravention of the EMPr, with input from the ECO. 		
<p>B2.1.4 The Environmental Control Officer</p>	<p>The Environmental Control Officer (ECO) will be an independent environmental consultant appointed by the Developer. The role of the ECO is to assist with the monitoring and where possible to provide guidance in terms of environmental matters. The ECO has no enforcement function to ensure compliance with the EA and EMPr. This is the responsibility of the Developer and authorities. The ECO has a supportive and monitoring role and advises the Developer of non-compliance with respect to the conditions of the EA. The ECO's duties consist of the following:</p> <ul style="list-style-type: none"> • Conducting regular site inspections at the frequency as stipulated in the EMPr. • Monitoring and verifying as far as possible adherence to the EMPr and the EA. • The ECO will report all noted/observed non-compliances with the EMPr and EA to the PM and recommend corrective action. • The ECO (in consultation with the Project Manager) must obtain, examine and approve construction method statements. • The ECO will make recommendations to the PM, with regards to the issuing of penalties for transgressions of the EMPr. • Assist the contractor with basic awareness 	<p>Technical Non-Compliance</p>	<p>Sillito Environmental Consulting was appointed as the ECO. The ECO undertook the following in order to remain complaint:</p> <ul style="list-style-type: none"> • The ECO undertook fortnightly site inspections as the EMPr stipulates that the ECO is to undertake 1 – 2 site inspections per month. • The ECO monitored in accordance with the EMPr and reported back through the ECO reports. The auditor noted that the ECO was not able to provide the original EA, only the Part 1 EA Amendment document. No monitoring was done with respect to the conditions within the EA, however some EA conditions were compliant as they were vested within the EMPr. • All non-compliances were noted within the ECO report. Corrective action was suggested for each non-compliance. • The ECO obtained method statements from the Contractors. No proof of method statement approval was provided to the ECO. • No penalties were issued for the duration of the construction phase. • The ECO reports noted that environmental training took place on the 20th of January 2022. • No proof of the ECO attending site meetings was provided to the auditor. • Solutions are recommended by the ECO through the ECO reports.

	<p>training of all construction staff and in establishing ongoing environmental awareness.</p> <ul style="list-style-type: none"> • The ECO must attend site meetings and report on, and respond to, any environmental issues and be issued with copies of minutes of such meetings. • Assisting in finding environmentally acceptable solutions to construction problems. • Advising the PM on the removal of person(s) and/or equipment not complying with the specifications. • Keep an up-to-date photographic record of site activities as part of the regular monitoring and reporting. • The ECO will draft an environmental monitoring report on a monthly basis. This report will be submitted to the Contractor, PM, DEA&DP and the Local Authority. 		<ul style="list-style-type: none"> • No removal of person(s) and/or equipment has been communicated to the auditor. • Photographic record of site activities were kept by the ECO, with some photographs included in each ECO report. • No monthly ECO reports have been provided to the auditor or proof of submissions to DEA&DP.
B2.1.5 The Contractor	<p>The contractor is bound by the requirements of this EMPr. The Contractor will be subject to the issuance of penalties by the MP as stipulated herein. Any damage to the environment temporary or otherwise as a result of non-compliance with this EMPr will be made good at the contractor's cost. In addition, the Contractor will have the following responsibilities:</p> <ul style="list-style-type: none"> • The Contractor will ensure that all sub-contractors and services providers are made aware of the requirements of the EMPr and that they have a responsibility to comply with the EMPr • The ECO will assist with the environmental induction training of site staff. It is the contractor's responsibility to ensure that all staff and sub-contractors attend and undergo the necessary environmental site inductions. The Contractor will maintain a 	Full Compliance	<p>Any non-compliances noted by the ECO within the ECO reports were generally dealt with in a timeous manner.</p> <ul style="list-style-type: none"> • The ECO is to confirm that the Contractors made sub-contractors and service providers aware of the requirements of the EMPr. • The ECO conducted environmental training on the 20th of January 2022. • The Contractors generally took timeous action against non-compliances noted within the ECO reports.

	<p>register of all staff and sub contractors that have undergone an environmental site induction.</p> <ul style="list-style-type: none"> The Contractor will study the ECO monitoring reports and take action as required. 		
<p>B2.2 Environmental Awareness Training</p>	<p>The Contractor shall ensure that adequate environmental training takes place and all employees are given an induction presentation on environmental awareness. Where possible, the presentation needs to be conducted in the language of the employees. Environmental awareness training should include the following:</p> <ul style="list-style-type: none"> the importance of conformance with all environmental policies the environmental impacts, actual or potential, of their work activities; the environmental benefits of improved personal performance; their roles and responsibilities in achieving conformance with the environmental policy, procedures and management systems, including emergency preparedness and response requirements; the potential consequences of departure from specified operating procedures; the mitigation measures required to be implemented when carrying out their work activities. <p>In the case of permanent staff, the Contractor shall provide evidence that such induction courses have been presented. In the case of new staff (including contract labour) the Contractor shall inform the ECO when and how he/she intends concluding its environmental training obligations.</p>	<p>Full Compliance</p>	<p>The ECO noted within the reports that environmental training was conducted on the 20th of January 2022. The contents of the training was not shared with Chand, however the ECO reports note that the training covered the correct protocols with regards to fauna, heritage resources found on site as well as hazardous substances stored on site. All documentation was removed from site at the time of the final environmental audit, therefore the auditor was not able to observe the environmental file.</p>

B2.5 Copies of EMPr	Copies of this CEMPr will be available at the PM's site offices. All senior personnel (contractors, subcontractors, professional consultants and PM) on the contract will be required to familiarise themselves with the content of the document and to act in such a way that the environment is protected accordingly.	Not Assessed	The auditor was not able to assess whether copies of the EMPr were available at the site offices as the site camp was de-established at the time of the inspection.
B2.6 Method Statements	<p>Method statements are written submissions by the Contractor to the PM (with input from the ECO) in response to the requirements of this EMPr or to a request by the PM or ECO. It is the Contractor's responsibility to ensure that the required method statements are drafted and submitted.</p> <p>The method statements must provide details regarding construction procedure, materials, timing, and sketches of the proposed construction method/design (where applicable). The Contractor shall not commence the activity for which a method statement is required until the PM and ECO have approved the relevant method statement.</p> <p>The method statements shall cover relevant details such as: A brief description of the works; Construction procedures and location of the construction site. A description/sketch map of the locality of work (if applicable). Start date and duration of the procedure. Materials, equipment and labour to be used. The names of the person/s or companies who are going to undertake the work. Storage, removal and subsequent handling of all materials, excess materials and waste materials of the procedure. Mitigation measures that will be employed.</p>	Full Compliance	Method statements were drafted and submitted in February 2022. The method statements followed the template provided within the EMPr and noted all necessary details.
B2.6.1 Minimum method	The following method statements are required as a minimum before construction commences on this project, and more method statements may be	Technical Non-Compliance	The following method statements were submitted by the Contractors: <ul style="list-style-type: none"> • Site establishment

statements required	requested as the project progresses. Site establishment Cement and concrete batching Access Routes and Traffic Control Dust Control Solid waste control system Hazardous Substances Fuel Storage No-go Areas Plant Maintenance Waste Water Control System		<ul style="list-style-type: none"> • Site clearance • Earthworks • Solid – and hazardous waste management • Noise control • Fuel • Workshop equipment and repairs • Dust control • Fire control • Emergency procedures • Trenching • Cement batching • No go area • Prime • Concrete mixing • Water usage <p>No method statement was drafted for access routes and traffic control or hazardous substances.</p>
STANDARD PROCEDURES, IMPACT MANAGEMENT OUTCOMES AND ACTIONS			
B3.1 Site Establishment and Contractors Camp	Contractors must compile a construction camp layout plan to indicate the placement and location of the above facilities and usage areas such as: Site offices; Stores, silos and stockpile areas; Large plant and vehicle workshop and parking area; Toilet facilities; Camp site access routes; Temporary waste and rubble storage area; and Fuel storage tanks or mobile fuel bowsers	Technical Non-Compliance	No construction camp layout plan was observed within the method statements, nor was it sent to Chand by the ECO. All documentation had been removed from site and the site camp has been de-established at the time of the final environmental audit, therefore the construction camp layout plan was not observed on site.
B3.1 Site Establishment and Contractors Camp	Contractors must erect and maintain temporary fences along the boundaries of their camps as agreed with the PM. No unauthorised entry shall be permitted beyond the perimeter of the fences. These fences may not be erected from materials and in such a way as to constitute a visual eyesore. The ECO shall recommend to the PM the removal of offending fencing.	Full Compliance	The Contractors commenced with the erection of temporary fences during February 2022, with the ECO noting within the ECO reports that this process would take approximately three weeks. The ECO report dated the 11 th of March 2022 stated that the fencing had been completed and that the site was demarcated.

B3.1 Site Establishment and Contractors Camp	The Project Manager shall approve the location of all camps. All camps shall be located in such a way as to minimise environmental (in the broadest sense) impact. The footprint of camps shall be kept to a minimum. The construction camp must not be placed in close proximity to the conservation area.	Technical Non-Compliance	No confirmation of approval has been provided to Chand. The ECO reports do not note where the site camp was established, however the reports note that no issues were identified. The site camp had been de-established at the time of the final environmental audit.
B3.1 Site Establishment and Contractors Camp	Where possible and practical all maintenance of vehicles and equipment must take place in the camp workshop area	Not Assessed	No mention of vehicle maintenance has been made within the ECO reports. No construction vehicles or machines were on observed on the estate during the final environmental audit, therefore the ECO was not able to assess this requirement.
B3.1 Site Establishment and Contractors Camp	During servicing of vehicles or equipment, especially where emergency repairs are effected outside the workshop area, a suitable drip tray with a capacity of 110% of the expected spill volume, must be used to prevent spills onto the soil	Not Assessed	No mention of vehicle and equipment servicing was made within the ECO reports. No construction vehicles or equipment were on observed on the estate during the final environmental audit, therefore the ECO was not able to assess this requirement.
B3.1 Site Establishment and Contractors Camp	Leaking equipment must be repaired immediately or be removed from site to facilitate repair	Not Assessed	No mention of leaking equipment was made within the ECO reports. No construction equipment was on observed on the estate during the final environmental audit, therefore the ECO was not able to assess this requirement
B3.1 Site Establishment and Contractors Camp	Workshop areas must be monitored for oil and fuel spills	Not Assessed	No workshop areas noted within the ECO reports. The site camp had been de-established at the time of the final environmental audit.
B3.1 Site Establishment and Contractors Camp	Appropriately sized spill kit kept onsite relevant to the scale of the activity taking place must be available	Full Compliance	A spill kit was made available on site, as noted within the ECO reports. The spill kit had been removed by the time of the final environmental audit.
B3.1 Site Establishment and Contractors Camp	The site layout plan shall also indicate security requirements (including temporary and permanent fencing, and lighting etc.)	Full Compliance	A site development layout plan was provided to Chand. This plan noted items such as the final layout of the development, the boundary wall and the layout of the conservation area.
B3.1 Site Establishment and Contractors Camp	Only security personnel may be accommodated at the construction site	Not Applicable	No security personnel accommodated on the construction site to the knowledge of the auditor.
B3.1 Site Establishment and Contractors Camp	Prior to the contractor taking handover of the site, the contractor will submit to the PM a site layout plan. This plan must be approved and signed off by the PM with input from the ECO	Technical Non-Compliance	A site development plan was provided to Chand, however no site camp layout plan was provided.

B3.1 Site Establishment and Contractors Camp	The PM will ensure that the ECO is involved in establishment of the camp layout prior to commencement of the proposed action	Technical Non-Compliance	Chand has not been provided with any evidence of ECO approval for the site camp location. The first ECO report noted that the site camp was to be established during September 2022. No further mention was made of the site camp, however it was noted that no works took place between the first inspection in September 2021 and February 2022.
B3.1 Site Establishment and Contractors Camp	Before construction can begin, the Contractor shall submit to the PM for approval a site establishment method statement.	Full Compliance	A site establishment method statement was submitted in February 2022.
B3.1 Site Establishment and Contractors Camp	A copy of the approved site layout plan will be provided to the ECO prior to commencement of construction. Changes to the site layout must be approved by the PM	Full Compliance	A site development layout plan was provided to Chand.
B3.2 Public Awareness and Safety	The Project Manager will ensure that the surrounding residents and landowners are aware of the construction activities. Queries from these persons and the general public will be dealt with in a timely and courteous manner by the PM and/or the ECO, if of an environmental nature.	Full Compliance	No queries or complaints communicated to the auditor.
B3.2 Public Awareness and Safety	Identify fire hazards, demarcate and restrict public access to these areas as well as notify the local authority of any potential threats e.g. fuels etc	Not Applicable	No fire hazards noted.
B3.2 Public Awareness and Safety	All unattended open excavations must be adequately fenced or demarcated.	Not Applicable	No open excavations observed during the final environmental audit. No note of excavations being fenced or demarcated noted in the ECO reports.
B3.2 Public Awareness and Safety	Adequate protective measures must be implemented to prevent unauthorised access to, and climbing of, partly constructed structures and protective scaffolding.	Full Compliance	No unauthorised access to, and climbing of, partly constructed structures and protective scaffolding noted in the ECO reports. During the final environmental audit, all structures had been fully constructed and no scaffolding was observed.
B3.2 Public Awareness and Safety	Ensure structures vulnerable to high winds are secured.	Not Applicable	No structures vulnerable to the wind observed during the final environmental audit.
B3.2 Public Awareness and Safety	Maintain an incidents and complaints register in which all incidents or complaints involving the public are logged	Technical Non-Compliance	The 2 nd ECO report noted that an incidents register would be opened once construction works commence, however it was never noted whether an incidents and complaints register was kept by the Contractors.

			No incidents or complaints were recorded within the ECO reports or communicated to Chand.
B3.2 Public Awareness and Safety	Notice boards displaying information about the project and development and professional team may be placed on site. The boards are to comply with the City of Cape Town's Outdoor Advertising and Signage By-Law 10518 of 2001. Prior to the erection of any signage, a signage application must be formally submitted to the Environmental and Heritage Management Branch for approval. Only one non-illuminated sign per street frontage will be allowed	Not Assessed	Minimal signage was noted within the estate during the final environmental audit. Emergency contact details were displayed at one of the refuse rooms close to the estate entrance. No notice boards were noted within the ECO reports. No proof of submission to the City of Cape Town for the construction notice boards provided to Chand.
B3.2 Public Awareness and Safety	The conservation area shall be securely fenced and any entry strictly prohibited. Security personnel must be made aware of this restriction	Not Applicable	The conservation area was fenced off with permanent fencing during the final environmental audit. The ECO reports note that the conservation area was cordoned off with barrier tape during the construction phase. The ECO reports contained photographs which displayed the area with adequate demarcation.
B3.2 Public Awareness and Safety	The Contractor shall observe the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) and ensure adequate safety precautions on the site	Full Compliance	The site was audited by an external Health and Safety consultant.
B3.2 Public Awareness and Safety	The Contractor shall liaise with neighbouring residents when necessary	Not Applicable	No need for the liaison with neighbouring residents was noted within the ECO reports or communicated to Chand.
B3.2 Public Awareness and Safety	The Contractor is responsible for the safety of construction personnel on the site during the construction phase	Full Compliance	Complied with.
B3.3 Site Demarcation and Jurisdiction	The site will be limited as far as possible to reduce the development footprint	Full Compliance	The site did not exceed the approved development footprint. All areas in and around the site were appropriately rehabilitated,
B3.3 Site Demarcation and Jurisdiction	The boundaries of the site shall be demarcated prior to any work commencing on the site.	Full Compliance	The site boundary fencing was constructed during February 2022. The Contractors undertook this demarcation once the clearing of site had commenced.
B3.3 Site Demarcation and Jurisdiction	All construction activities, materials, equipment and personnel will be restricted to within the site.	Full Compliance	The auditor noted that all activities had been contained to the estate boundaries during the final environmental audit. The ECO did not note any movement or activities outside of the site boundary.

B3.3 Site Demarcation and Jurisdiction	Brightly painted droppers and brightly coloured nylon cord/netting/fencing/wire with markers must be considered as an alternative to danger tape	Full Compliance	The ECO reports noted that barrier tape was utilized as demarcation. The site camp was demarcated with ready-fencing panels.
B3.3 Site Demarcation and Jurisdiction	The demarcations must be maintained and ensure that materials used for construction on the site do not blow on or move outside the site	Full Compliance	All demarcations were maintained for the duration of the project.
B3.3 Site Demarcation and Jurisdiction	Construction workers, vehicles and works are forbidden to access any private and public property outside the site unless approval has been granted by the PM in writing after the land owner has given permission	Full Compliance	The auditor was not informed of any unauthorised access to areas outside of the development footprint.
B3.3 Site Demarcation and Jurisdiction	The boundary of the site will be agreed with and approved by the PM	Full Compliance	Complied with.
B3.3 Site Demarcation and Jurisdiction	The Contractor shall ensure that the approved construction area will be adequate to cover the project without further space adjustments being required at a later date. Changes must be approved by the PM	Not Applicable	No changes deemed necessary for the duration of the project.
B3.3 Site Demarcation and Jurisdiction	The method of demarcating the boundaries shall be determined by the Contractor and agreed to by the PM prior to any work being undertaken	Full Compliance	The demarcation of the site was undertaken after site clearing. During site clearing, the site boundary had been pegged but not fenced off as SDP approval had not been received from the City of Cape Town.
B3.3 Site Demarcation and Jurisdiction	The Contractor shall ensure that all works, labour and materials remain within the boundaries of the site, unless otherwise agreed in writing with the PM. It will be the responsibility of the Contractor to decide on an appropriate system of protective fencing for the site, if required.	Full Compliance	All works, labour and material remained within the site boundary.
B3.4 General Cleanliness of the site and impact on adjacent residential areas.	All contractors shall take note of the fact that residential areas occur adjacent to the site. Contractors shall at all times respect the privacy and rights of these residents by limiting noise, dust and litter and not blocking accesses.	Full Compliance	Complied with. No complaints received from the surrounding residential areas.
B3.4 General Cleanliness of the site and	All construction areas must be kept neat and tidy. Different materials and equipment must be kept in	Full Compliance	The ECO reports noted that the site was generally tidy throughout the construction phase as well as being noted during the final environmental audit.

impact on adjacent residential areas.	designated areas and storing/stockpiling shall be kept orderly.		
B3.4 General Cleanliness of the site and impact on adjacent residential areas.	Site camp lighting must be minimal and cause the least impact at night. All light sources must be shielded so that only the area that needs to be lit is lit. No floodlights are permitted. Security lighting must be placed such that it is not a nuisance to residents and visitors to the area.	Not Assessed	This was not assessed by the auditor as the site camp was de-established at the time of the final environmental audit. No site camp lighting was noted in the ECO reports.
B3.4 General Cleanliness of the site and impact on adjacent residential areas.	Litter and construction rubble may not enter the conservation area.	Full Compliance	No litter observed in the conservation area.
B3.4 General Cleanliness of the site and impact on adjacent residential areas.	The contractor will ensure that the site is neat and well maintained	Technical Non-Compliance	Efforts were made to keep the site as tidy as possible, however various non-compliances were noted within the ECO reports for the duration of the construction phase. The ECO noted that there were no provisions for waste management available on site during the 36 th , 37 th and 38 th site inspections. The ECO noted that refuse and general waste was not adequately disposed of in the 19 th , 20 th and 28 th ECO reports. In addition, the ECO noted that empty cement bags were not adequately disposed of in the 4 th , 6 th , 10 th , 16 th , 19 th , 20 th and 31 st ECO reports.
B3.5 Location of Contractor's Camps and Workshops	Contractors must erect and maintain temporary fences along the boundaries of their camps and construction areas as agreed with the PM. No unauthorised entry shall be permitted beyond the perimeter of the fences. These fences may not be erected from materials and in such a way as to constitute a visual eyesore. The ECO shall recommend to the PM the removal of offending fencing.	Full Compliance	The site camp had been demarcated with ready fence panelling as seen in the photographs in the ECO reports. The fencing did not appear to have negative visual impacts.
B3.5 Location of Contractor's	The Project Manager shall approve the location of all camps. All camps shall be located in such a way as to minimise environmental (in the broadest	Not Assessed	No proof of approvals provided to Chand.

Camps and Workshops	sense) impact. The construction camp must not be placed in close proximity to the conservation area.		
B3.5 Location of Contractor's Camps and Workshops	The PM may require all contractors to screen unsightly storage areas and other sites. The material (such as shade cloth) to be used must be approved by the Project Manager.	Not Applicable	No unsightly storage areas to the need for screening noted within the ECO reports. All storage areas had been de-established during the final environmental audit.
B3.5 Location of Contractor's Camps and Workshops	Where possible and practical all maintenance of vehicles and equipment must take place in the camp workshop area.	Not Assessed	No maintenance of vehicles noted within the ECO reports. All vehicles had been removed from the site at the time of the final environmental audit.
B3.5 Location of Contractor's Camps and Workshops	During servicing of vehicles or equipment, especially where emergency repairs are effected outside the workshop area, a suitable drip tray with a capacity of 110% of the expected spill volume, must be used to prevent spills onto the soil	Not Assessed	No servicing of vehicles or equipment noted within the ECO reports. All vehicles and equipment had been removed from the site at the time of the final environmental audit.
B3.5 Location of Contractor's Camps and Workshops	Leaking equipment must be repaired immediately or be removed from site to facilitate repair	Not Assessed	No leaking equipment observed during the final environmental audit or noted within the ECO reports.
B3.5 Location of Contractor's Camps and Workshops	Workshop areas must be monitored for oil and fuel spills	Not Assessed	No fuel spills noted within the ECO reports.
B3.5 Location of Contractor's Camps and Workshops	Appropriately sized spill kit kept onsite relevant to the scale of the activity taking place must be available	Full Compliance	A spill kit was kept on site, in the site camp. No spills were noted within the ECO reports.
B3.5 Location of Contractor's Camps and Workshops	The contractor will ensure that drip trays are being used at all times, and that there are enough drip trays available on site.	Material Non-Compliance	The 7 th ECO report noted that drip trays were not utilized underneath fuel-powered machinery. This was noted once again in the 8 th , 11 th , 16 th , 28 th , 31 st , 35 th and 42 nd ECO reports and was rectified by the following inspections.
B3.7 Fencing	Adequate fencing needs to be provided around the site. Fencing needs to be checked and maintained during the construction phase	Full Compliance	Adequate fencing had been utilised to demarcate the site boundaries.
B3.7 Fencing	Pedestrian and vehicle gates in perimeter fences must be able to be securely locked for security reasons.	Not Assessed	Pedestrian and vehicle gates were not noted within the ECO reports. The permanent guardhouse, which controls access to the estate, was in place at the time of the final environmental audit.

B3.7 Fencing	Temporary fencing demarcating no-go areas and other construction camp and staging areas shall be erected prior to any construction activities commencing on site. Danger tape is not sufficient and orange mesh fencing shall be used.	Full Compliance	The ECO reports note that the area was cordoned off with barrier tape and later, shade netting.
B3.7 Fencing	The conservation area should be fenced off with permanent wire fencing before construction commences.	Technical Non-Compliance	The conservation area was not fenced off with permanent wire fencing prior to construction commencing. The area was classified as a no-go area and was demarcated with barrier tape and later, shade netting.
B3.7 Fencing	It will be the responsibility of the Contractor to decide on an appropriate system of protective perimeter fencing for the site.	Full Compliance	The site was adequately fenced for the duration of the construction phase with no issues being noted within the Eco reports.
B3.7 Fencing	The Contractor and PM, The ECO, Botanist and officials from the CoCT Biodiversity and Environmental Management Branches must also be present when this fencing task is initiated.	Not Assessed	No proof of inclusion of all parties was provided to Chand.
3.8 Protection of Fauna	No fauna is to be poisoned, hurt, hunted or killed on site. In the event that an animal does not move away on its own from the site, the ECO must be contacted, who shall contact a specialist to aid in removal.	Full Compliance	According to the ECO reports, the Contractors noted that they did not encounter any animals on site for the duration of construction.
3.8 Protection of Fauna	The fenced-off conservation area must remain a no-go area and all animals within this area must be strictly left alone and not disturbed in any way.	Full Compliance	The conservation area was classified as a no-go area with note of animals being disturbed for the duration of construction.
3.8 Protection of Fauna	The feeding of any wild animals is prohibited. No food or food products will be stored in such a way as to attract scavengers.	Full Compliance	According to the ECO reports, the Contractors noted that they did not encounter any animals on site for the duration of construction.
3.8 Protection of Fauna	The use of pesticides is prohibited unless approved by the PM.	Full Compliance	No use of pesticides noted within the ECO reports or observed during the final environmental audit.
3.8 Protection of Fauna	No domestic pets are permitted on site without the permission of the PM.	Full Compliance	According to the ECO reports, the Contractors noted that they did not encounter any animals on site for the duration of construction.
3.8 Protection of Fauna	Excavations must not act as traps and must be done in such a way as to allow for small animals to escape. More permanent structures such as drains and manholes must be adequately covered.	Full Compliance	According to the ECO reports, the Contractors noted that they did not encounter any animals on site for the duration of construction.
3.8 Protection of Fauna	Animals such as snakes must be removed and released by specialist handlers	Not Applicable	No need for specialist handlers was deemed necessary as no animals were encountered on site during construction.

3.9 Site Clearing Removal of Vegetation	No vegetation clearing shall take place without approval of the method statement by the PM	Material Non-Compliance	Vegetation clearing took place prior to the approval of method statements. Vegetation clearing took place during August 2021 while the method statements were sent to the ECO for approval in February 2022.
3.9 Site Clearing Removal of Vegetation	No vegetation clearing shall take place until the site boundaries and "No-Go" areas are clearly demarcated, temporarily or permanently fenced off. Vegetation clearing may not extend beyond the site boundary	Material Non-Compliance	Vegetation clearing took place prior to site boundaries and demarcations being put in place. Vegetation clearing took place in August 2021. During the 1 st ECO site inspection, the ECO noted that the site boundary had been pegged but had not been fenced off as SDP Approval had not been received from the City of Cape Town. To the auditor's knowledge, no vegetation clearing occurred beyond the site boundaries.
3.9 Site Clearing Removal of Vegetation	The conservation area must be demarcated and securely fenced off, before commencing with vegetation clearing	Material Non-Compliance	The conservation area had not been demarcated prior to vegetation clearing. Vegetation clearing was undertaken in August 2021 while the conservation area was demarcated in February 2022. The botanist stated that he did not want to bring unwanted attention to the conservation area prior to the site being demarcated.
3.9 Site Clearing Removal of Vegetation	Search and rescue must be conducted of all geophytes and transplantable species. This operation is to be conducted by an appropriately experienced botanist/landscape architect/indigenous landscaper	Full Compliance	The botanist undertook a search and rescue on the 14 th of July 2021. The botanist recorded twelve <i>Aspalathus retroflexa ssp</i> plants were recorded outside of the conservation area. The plants were relocated into the conservation area in close proximity to one another to promote population growth of the species.
3.9 Site Clearing Removal of Vegetation	Consideration should be given to a phased clearing approach to limit potential impacts resulting from large areas devoid of cover	Not Assessed	The auditor was not appointed during vegetation clearing. The auditor noted one ECO report which noted clearing being underway which was not sufficient to determine whether a phased approach was utilised.
3.9 Site Clearing Removal of Vegetation	Plant material, excluding alien invader plants, can be mulched for use in later landscaping	Not Assessed	No mention was made of plant material being mulched. Landscaping had been completed by the time of the final environmental audit, therefore the auditor was not able to assess this requirement.
3.9 Site Clearing Removal of Vegetation	Alien invader vegetation must be removed to a registered landfill site	Not Assessed	The first ECO report noted that alien vegetation was in the process of being removed, however the reports did not note where the vegetation was removed to.
B3.10 Stripping and stockpiling topsoil	Topsoil shall, without fail, be stripped, up to 300mm, and stockpiled in consultation with the ECO.	Not Assessed	This was not noted within the ECO reports or observed by the auditor and therefore was not assessed.
B3.10 Stripping and stockpiling topsoil	Stockpiled material shall be replaced in subsequent landscaping	Not Assessed	This was not noted within the ECO reports or observed by the auditor and therefore was not assessed.

B3.10 Stripping and stockpiling topsoil	Stockpiled material will be protected from the elements to avoid run off and dust pollution	Not Applicable	No protection of stockpiled material was noted within the ECO reports, however it appeared that dust control was in place. No need for additional protection measures were noted by the ECO.
B3.10 Stripping and stockpiling topsoil	Stockpiles must not exceed 2m in height and if covered, permeable covering will be used to allow soil to breathe and prevent seeds from rotting. The seed bank in topsoil must be preserved	Not Assessed	This was not noted within the ECO reports or observed by the auditor and therefore was not assessed.
B3.10 Stripping and stockpiling topsoil	Topsoil stockpiles shall be monitored regularly by the contractor to identify any alien plants, which shall be removed when they germinate to prevent contamination of the seed bank	Not Assessed	This was not noted within the ECO reports or observed by the auditor and therefore was not assessed.
B3.10 Stripping and stockpiling topsoil	Stockpiling of topsoil shall be done in such a manner as to prevent any topsoil from entering the stormwater system, whether existing or proposed, due to stormwater runoff or wind-blown material	Not Assessed	This was not noted within the ECO reports or observed by the auditor and therefore was not assessed.
B3.11 Site Safety and Security	The construction site should be secured against unauthorised entry	Full Compliance	The ECO advised that the construction site was protected against unauthorized access throughout the construction phase.
B3.11 Site Safety and Security	Adequate fencing needs to be provided around the site. Fencing needs to be checked and maintained during the construction phase	Full Compliance	The site was adequately fenced for the duration of the construction phase.
B3.11 Site Safety and Security	All personnel must be adequately trained and informed in the tasks that they are expected to perform. This is required for their own safety as well as the safety of colleagues and other interested and/or affected parties	Full Compliance	The ECO conducted an environmental training on the 20 th of January 2022. No notes were made of any additional trainings.
B3.11 Site Safety and Security	Construction workers will be supervised on site during the development phase	Full Compliance	Complied with.
B3.11 Site Safety and Security	No unauthorised personnel shall be allowed onto site	Full Compliance	Unauthorised entry had been prohibited for the duration of the construction phase.
B3.11 Site Safety and Security	No personnel, except for security personnel, are allowed to stay overnight on site	Full Compliance	The ECO reports did not note any arrangements for personnel to remain on site overnight. The auditor did not observe any overnight facilities during the final environmental audit.
B3.11 Site Safety and Security	The contractor must ensure that his equipment is protected	Full Compliance	The site was adequately fenced off, securing the equipment within.
B3.11 Site Safety and Security	All excavated areas and/or holes should be clearly demarcated	Not Assessed	This requirement was not assessed by the auditor as no excavations were observed during the final environmental audit. The ECO reports did not note excavations.

B3.11 Site Safety and Security	Maintain environmental incidents register in which all environmental incidents (e.g. accidental spillages etc.) are logged	Full Compliance	The ECO reports noted that an incidents register was kept in the site camp.
B3.11 Site Safety and Security	The conservation area shall remain a no-go area to all personnel, visitors, and neighbouring residents. Security officers to be alerted to this restriction	Full Compliance	The conservation was considered a no-go area and demarcated as such.
B3.11 Site Safety and Security	Security officers alerted to the no-go status of the conservation area	Not Assessed	This requirement was not assessed as the ECO reports did not note the information conveyed to the security officers. The ECO reports did note that no personnel entered the no-go area.
B3.11 Site Safety and Security	ECO to provide details of any incidents involving the conservation area in environmental monitoring reports	Not Applicable	No incidents reported within the ECO reports.
B3.12 Waste Water Management	An impermeable sump lined with thick DPC plastic may be constructed by the Contractor in order to collect waste water from batching and tool washing. The sump will be open to allow the water to evaporate. The sump must not overflow, especially during the wet season. Once the sump is dry the remaining material at the bottom of the sump will be disposed of with the building rubble	Not Assessed	No sump was mentioned within the ECO reports or observed on site.
B3.12 Waste Water Management	Small volume waste water collected from washing and other small volume cement work activities will be disposed of on top of the general rubble pile where it will be absorbed. This will be done in such a way as to ensure that there is no run-off from the rubble pile to surrounding areas. The waste water shall not be of such volume that it will saturate the entire body of rubble or will soak through the rubble pile	Not Assessed	No waste water collection was mentioned within the ECO reports or observed on site.
B3.12 Waste Water Management	Runoff from fuel depots / bunds / workshops / machinery washing areas and water contaminated with petro-chemicals and hydrocarbons shall be addressed as indicated in the hazardous waste section of this document	Not Assessed	No runoff from fuel depots / bunds / workshops / machinery washing areas and water contaminated with petro-chemicals and hydrocarbons was observed during the final environmental audit or noted within the ECO reports.
B3.12 Waste Water Management	Water from kitchens, showers, sinks and toilets etc. shall be discharged into a conservancy tank for	Not Assessed	This was not assessed as this requirement was not mentioned within the ECO reports or observed during the final environmental audit.

	removal from the site or be plumbed into a sewer line if this is available		
B3.12 Waste Water Management	Waste water from tool washing, batching, grouting, cleaning, showers, kitchens or similar sources is not permitted to enter or be disposed of into a storm water system or directly onto bare soil	Not Assessed	No waste water noted within the ECO reports or observed during the final environmental audit.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	The Contractor shall be required to ensure that traffic along public roads is accommodated and construction activities and deliveries do not interfere with the public road system	Not Assessed	This requirement was not noted within the ECO reports or observed during the final environmental audit as it was no longer required.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	The Contractor will ensure that all the required permissions have been obtained from the traffic authorities in writing before undertaking work or machinery movement that may affect public roads	Not Assessed	No permissions have been communicated or provided to the auditor and could therefore not be assessed.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	All the required signage and hazard warnings are to be put in place	Not Assessed	No mention of signage was made within the ECO reports or noted during the final environmental audit.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	The Contractor will insure that all operators and drivers of any vehicle on the site shall be properly licensed and insured to operate such a vehicle	Not Assessed	No mention of licensing and insurances of vehicles was made within the ECO reports or provided to the auditor.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	The Contractor is responsible for ensuring that all vehicles are road worthy. All relevant permits for abnormal loads must be applied for and obtained from the relevant authority as required	Not Assessed	No mention of vehicle road worthiness was made within the ECO reports or noted during the final environmental audit.
B3.13 Access Routes and use	Access points to and from site as well as road ways in front of the site are to be kept clean and free	Full Compliance	The ECO noted that the access point via Darwin Road was kept neat.

of vehicles on site and in vicinity of the site	from stone, sand and grit. These areas must be swept regularly		
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	All construction vehicles, when on site, will not exceed a speed of 25km per hour, or such other maximum speed as determined by the PM	Not Assessed	No mention of the speed limit was made within the ECO reports.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	Access to the site must be confined to entrances designated by the PM. Use should be made of existing haul routes, tracks and roads. The creation of short-cut paths/routes or temporary vehicular tracks is to be strictly prevented	Full Compliance	Access to site was via Darwin Road.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	Care must be taken to route temporary roads away from the conservation area boundary. The ECO must monitor this restriction	Full Compliance	No damage of the conservation was noted within the ECO reports. Monitoring of the conservation area was undertaken by the ECO.
B3.13 Access Routes and use of vehicles on site and in vicinity of the site	Official speed limits on public roads outside the site will be strictly observed by all personnel operating machinery or driving vehicles associated with the project	Not Assessed	No mention of the speed limit was made within the ECO reports.
B3.14 Hazardous substances	The use and storage of hazardous substances must be minimized	Full Compliance	Minimal hazardous substances noted within the ECO reports.
B3.14 Hazardous substances	Non-hazardous and non-toxic alternatives must be used when possible	Not Assessed	No mention of non-hazardous alternatives was made within the ECO reports.
B3.14 Hazardous substances	All hazardous substances will be stored in suitable containers clearly marked to indicate contents, quantities and safety requirements. The manufactures' original containers and packaging must be retained. Decanting must be avoided	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.

B3.14 Hazardous substances	All storage areas will be bunded. The bunded area will be of sufficient capacity to contain a spill / leak from the stored containers	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	All fuel, oil, chemicals etc shall be confined to specific areas approved by the ECO and PM. Gas and fuel shall not be stored in the same storage area	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	Contractors shall keep all hazardous materials under lock and key. Relevant information signage is to be erected at the hazardous materials/ fuels storage area	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	The Contractor must ensure that diesel and other liquid fuel, oil and hydraulic fluid is stored in appropriate storage tanks or in bowsers	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	The tanks/ bowsers must be situated on a smooth impermeable surface (concrete) with a permanent bund. Fuel tanks and bowsers shall be bunded to contain 110% of the volume of such tanks and bowsers	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	Provision must be made for refuelling at the storage area by protecting the soil with an impermeable groundcover	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	No smoking must be allowed within the vicinity of the hazardous storage areas	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	Adequate fire-fighting equipment must be made available at all hazardous storage areas	Not Assessed	No mention of the hazardous substances storage was made within the ECO reports.
B3.14 Hazardous substances	Where refuelling away from the dedicated refuelling station is required, a mobile refuelling bowser must be used. Appropriate ground protection such as drip trays must be used	Not Assessed	No mention of the refuelling areas was made within the ECO reports.
B3.14 Hazardous substances	An appropriately sized spill kit kept onsite relevant to the scale of the activity/s involving the use of hazardous substance must be available	Full Compliance	A spill kit was provided by the Contractors and was stored within the site camp.
B3.14 Hazardous substances	The responsible operator must have the required training to make use of the spill kit in emergency situations	Full Compliance	The ECO undertook environmental training on the 20 th of January 2022.
B3.14 Hazardous substances	In the event of a spill, contaminated soil must be collected in containers and stored in a central	Not Applicable	No spills noted for the duration of the construction period.

	location and disposed of according to the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008).		
B3.15 Hazardous Waste Storage	All hazardous waste (including bitumen, old oil etc.) shall be disposed of at a licensed hazardous landfill site (such as Visserhok), or hazardous waste facility, which is licensed to receive such waste. Alternatively, the contractor may appoint a reputable waste management service provider to remove and dispose of hazardous waste	Not Applicable	No hazardous waste was generated, to the knowledge of the auditor.
B3.15 Hazardous Waste Storage	The Contractor must provide disposal certificates to the PM and copies will be provided to the ECO	Not Applicable	No waste disposal certificates have been provided as no hazardous waste has been generated, to the knowledge of the auditor.
B3.15 Hazardous Waste Storage	Under no circumstances shall the spoiling of tar or bituminous products on the site, over embankments, or any burying, be allowed. Unused or rejected tar or bituminous products shall be returned to the supplier's production plant or recycled as an alternative to disposal	Full Compliance	No spoiling of tar or bituminous products was noted.
B3.15 Hazardous Waste Storage	Used oil, lubricants, cleaning materials, etc. from vehicles, machinery or bund areas shall be collected in holding tanks and removed from site by a specialist oil recycling company as an alternative to disposal	Not Applicable	No used oil, lubricants or cleaning materials were noted.
B3.15 Hazardous Waste Storage	Once a spill remediation product has been used or has been used to treat contaminated materials (soil, rubble etc.) the resulting waste must be disposed of at a facility licensed to receive such waste	Not Applicable	No spill remediation product was used to the knowledge of the auditor.
B3.16 Fires	An uncontrolled fire in the conservation area must be avoided and the PM shall stress the fire danger at all Toolbox meetings. Contractors shall ensure that their staff are aware of the fire danger and are aware of the procedure to be followed in the event of a fire. The PM and ECO shall be notified immediately in the event of a fire on site	Full Compliance	No uncontrolled fires occurred on site, to the knowledge of the auditor.
B3.16 Fires	Contractors shall supply all site offices, eating areas, workshop areas, stores of fuel and	Full Compliance	The ECO noted that fire extinguishers were made available on site.

	hazardous materials and any other areas identified by the ECO and PM with fire extinguishers		
B3.16 Fires	Smoking shall not be permitted in those areas where there a fire hazard. Such areas shall include any workshop and fuel storage areas and areas where the vegetation or other material may promote the rapid spread of an initial flame	Not Assessed	No mention of smoking was noted within the ECO reports.
B3.16 Fires	Welding, gas cutting or cutting of metal will only be allowed in areas where there is no danger of fires starting from the sparks, unless special precautions are taken. Wherever such work is undertaken, fire-fighting equipment shall be immediately available	Not Assessed	No welding, gas cutting or cutting of metal noted within the ECO reports.
B3.16 Fires	No building rubble and litter such as cement bags and timber off-cuts will be burned on site	Full Compliance	No burning of building rubble and litter such as cement bags and timber off-cuts noted by the ECO or observed during the final environmental audit.
B3.16 Fires	The Contractor shall appoint a fire officer who shall be responsible for ensuring immediate and appropriate action in the event of a fire	Technical Non-Compliance	No fire officer was noted within the ECO reports.
B3.16 Fires	Braai and cooking fires will only be allowed at the construction camp under controlled conditions and NOT at the construction sites.	Full Compliance	Braai facilities were available within the site camp. No cooking fires were noted elsewhere on site.
B3.16 Fires	Contractors shall pay the costs incurred by organisations called out to extinguish any fires started by themselves or any of their site staff	Not Applicable	No fires noted on site for the duration of the construction period.
B3.17 Emergency Procedures	Contractors shall ensure that there is an emergency advisory procedure on site before commencing any operations that may endanger the lives of any of their staff, other consultants and contractors, and members of the public, or cause damage to the environment. The Contractor's environmental emergency procedures must ensure appropriate responses to unexpected / accidental actions / incidents that could cause environmental impacts. Such incidents may include: Accidental discharges to water and land; Accidental spillage of hazardous substances (typically oil, petrol, and diesel);	Full Compliance	The Contractors submitted an 'emergency procedures' method statement in February 2022. In addition, the ECO reports noted that an emergency response plan was provided by the Contractors in January 2022.

	Accidental toxic emissions into the air; and Specific environmental and ecosystem effects from accidental releases or incidents.		
B3.17 Emergency Procedures	Contractors shall also ensure that their staff and other contractors and consultants are familiar with all emergency procedures to be followed Contractors shall also ensure that their staff and other contractors and consultants are familiar with all emergency procedures to be followed	Not Assessed	The ECO reports did not make note of emergency procedures being communicated with all staff. The 'emergency procedures' method statement notes that staff shall be informed of emergency procedures, however no proof of training has been provided.
B3.17 Emergency Procedures	Contractors shall identify all fuels and hazardous substances to be stored on site and shall ensure that they know the effects of these substances on their staff and the environment. A copy of the fuels and hazardous substance inventory shall be supplied to the ECO	Technical Non- Compliance	No hazardous substance inventory was provided to the auditor neither was it noted within the ECO reports.
B3.17 Emergency Procedures	The contractor shall ensure that his employees are aware of the procedure to be followed for dealing with spills and leaks, which shall include notifying the PM and ECO	Technical Non- Compliance	The Contractor's method statements note that staff shall be made aware of emergency procedures, however no proof was provided to the auditor. The notifying the PM and ECO was not detailed within the ECO reports and no proof was provided to the auditor.
B3.17 Emergency Procedures	The Contractor shall ensure that the necessary spill response / hydrocarbon remediation materials and equipment for dealing with spills and leaks are available on site	Full Compliance	A spill kit was made available on site.
B3.17 Emergency Procedures	The Environmental Emergency Response Plan is separate to the Health and Safety Plan as it is aimed at responding specifically to environmental incidents. Such a plan must include the following: <ul style="list-style-type: none"> • Details of the organisation (i.e. manpower) and responsibilities, accountability and liability of personnel; • A list of key personnel and contact numbers; • Details of emergency services (e.g. the fire department / on-site fire detail, spill clean-up services) shall be listed; • Internal and external communication plans, 		The Environmental Emergency Response Plan was not provided to the auditor. The 'emergency procedures' method statement notes works which were to be undertaken by the Contractors and where external parties shall be appointed. Internal and external communication plans were noted. A list of key personnel and contact details as well as details of emergency services were not provided. No note was made of incident reporting, however measures to be implemented in the event of an emergency were noted.

	<p>including prescribed reporting procedures;</p> <ul style="list-style-type: none"> • Incident recording, progress reporting and remediation measures to be implemented; 		
B3.18 Site Facilities	Toilets must be easily accessible.	Full Compliance	The photographs within the ECO report display the toilets to be easily accessible.
B3.18 Site Facilities	If mobile chemical toilets are installed these shall be of a neat construction and shall be provided with doors and locks and shall be secured to prevent them blowing over.	Full Compliance	Toilets were noted to be fastened to the ground throughout the construction phase. The 3 rd ECO report noted that a chemical toilet was not secured to the ground, however this was rectified by the following inspection.
B3.18 Site Facilities	Contractors shall be responsible for the maintenance and servicing of the toilets and sewage systems on site	Full Compliance	Toilet maintenance slips were provided to the ECO and photographs were provided in the ECO reports.
B3.18 Site Facilities	Toilets must have an external closing mechanism and are closed and secured from the outside when not in use. Toilets are emptied before long weekends and workers holidays, and must be locked after working hours.	Full Compliance	Toilets were adequately secured and was serviced regularly.
B3.18 Site Facilities	Toilets shall be supplied at a ratio of 1 per 20 workers if connected to a waterborne system, alternatively 1 per 15 workers if chemical toilets are used	Not Assessed	The number of staff on site was not noted, however two chemical toilets were made available.
B3.18 Site Facilities	Contractors shall ensure that no spillage occurs when chemical toilets are cleaned and that the contents are properly stored and removed off site	Full Compliance	No spillage noted from the chemical toilets.
B3.18 Site Facilities	Toilets must be serviced regularly, and the ECO must inspect toilets to ensure compliance to health standards	Full Compliance	Toilets were noted to be serviced regularly throughout the construction phase. Toilet maintenance slips were provided to the ECO and photographs were provided in the ECO reports.
B3.18 Site Facilities	The placing of toilets shall be done in consultation with the PM and ECO. Toilets must be close to construction and other work areas	Full Compliance	Toilets were available in the site camp.
B3.18 Site Facilities	Copies of the waste disposal certificates must be maintained in the Environmental File	Full Compliance	Toilet maintenance slips were provided to the ECO and photographs were provided in the ECO reports.
B3.18 Site Facilities	Each contractor shall designate restricted places for eating in his working areas and shall provide adequate refuse bins at all these places, which must be cleaned on a daily basis	Full Compliance	During the first ECO inspection, no waste management provisions had been made, however it was noted to be rectified during the following inspection.

B3.18 Site Facilities	The bins must be weatherproof and scavenger proof and approved by the PM	Full Compliance	Waste bins were available in the site camp, with photographs available in the ECO reports.
B3.18 Site Facilities	Adequate temporary shade must be provided within the construction areas to ensure that site personnel do not move off site to eat	Full Compliance	The ECO reports noted that an eating area was established within the site camp.
B3.18 Site Facilities	No feeding of wild animals shall be permitted. Food and food products are to be stored in such a way so as not to attract scavenging animals	Not Assessed	No feeding of wild animals noted within the ECO reports.
B3.18 Site Facilities	Contractors shall be responsible for providing drinking and washing water for their staff	Not Assessed	Drinking water provisions were not noted in the ECO reports.
B3.18 Site Facilities	All drinking water must be of a recognised standard for potable use	Not Assessed	Drinking water provisions were not noted in the ECO reports.
B3.18 Site Facilities	No water may be abstracted from streams, rivers, wetlands or boreholes unless the necessary water use authorisations are in place	Material Non-Compliance	During the final environmental audit, a borehole pump as well as six large water tanks were noted on the estate. No water use license was provided to the auditor. The auditor was advised that between 8000L and 10 000L are utilized per day for irrigation purposes.
B3.18 Site Facilities	No water is to be wasted on site. All taps and pipes should be checked on a regular basis for leaks, and repaired. All pipes, taps and associated infrastructure is to be maintained in good working order	Full Compliance	No water wastage noted within the ECO reports. The ECO noted that one labourer provided their own water.
B3.19 Solid Waste Management	Waste should be separated for recycling where possible	Not Assessed	No water recycling noted.
B3.19 Solid Waste Management	Contractors shall be responsible for the establishment of a refuse control and removal system, acceptable to the PM and ECO, in order to prevent the spread of refuse in, and beyond, construction sites. Refuse must be collected in wire cages and be protected from rain, which may cause pollutants to leach out	Material Non-Compliance	A waste management system was not in place during the 1 st inspection, however the necessary bins and skips were later brought to site. The 36 th ECO report stated that no provisions for waste management and disposal, such as bins, were available on site. This was noted once again within the 37 th and 38 th ECO reports. This was rectified within the 39 th ECO report, with waste skips and bins being made available on site.
B3.19 Solid Waste Management	Refuse collected from the site shall be stored in an appropriate closed and weatherproof container and removed on a regular basis as agreed with the	Full Compliance	Refuse was stored in appropriate waste bins. Waste was removed from site on a regular basis with proof of waste removal noted in the ECO reports, with photographs.

	PM and ECO. Refuse may not be burnt nor buried on site, or vicinity		
B3.19 Solid Waste Management	Bins must be clearly marked for ease of management. All refuse bins must have a lid secured so that scavenging animals cannot gain access	Technical Non-Compliance	The auditor did not observe clearly marked bins within the ECO reports. The photographs provided did not display any labels on the waste bins. All refuse bins were secured with lids.
B3.19 Solid Waste Management	Contractors shall clean up their respective construction sites on a daily basis. The general cleanliness of the site shall form part of the inspections of the ECO	Material Non-Compliance	Refuse/general waste was not adequately disposed of in the bins provided as reported within the 19 th , 20 th and 28 th ECO reports.
B3.19 Solid Waste Management	Contractors must provide and maintain a method statement for "solid waste management". The method statement must provide information on proposed licensed facility to be utilised and details of proposed record keeping for auditing purposes	Full Compliance	A method statement was submitted for solid and hazardous waste management. The method statement specifies that waste will be removed to an approved licensed landfill facilities, however it does not specify the facility itself. The method statement noted that record shall be kept of waste removal, with all slips kept on site. These slips were provided to the ECO as proof during the construction phase.
B3.19 Solid Waste Management	Any illegal dumping of waste will not be tolerated. Proof of legal dumping must be produced on request	Full Compliance	No illegal dumping of waste was noted by the ECO. Proof of waste disposal was provided to the ECO during the ECO inspections. Waste disposal slips were kept in the site camp.
B3.20 Materials and Material Stockpiles	Contractors shall identify sites for stockpiling all their materials, including mulched vegetation, topsoil, material from excavation operations, aggregate, sand and bitumen	Full Compliance	The ECO noted that all materials were neatly stockpiled in the site camp.
B3.20 Materials and Material Stockpiles	These sites shall be approved by the ECO and PM	Not Assessed	No proof of approval has been provided.
B3.20 Materials and Material Stockpiles	Stockpile sites shall be fenced (unless otherwise agreed with the ECO and PM) screened and perimeter boarding erected. Measures must be implemented to prevent pollution from stockpiles	Full Compliance	The site camp was adequately fenced and the ECO reports noted that all materials were neatly stockpiled in the site camp.
B3.20 Materials and Material Stockpiles	Sandbags (or similar) should be placed at the bases of the stockpiled material in order to prevent erosion of the material	Not Applicable	No sandbags utilized on site, to the knowledge of the auditor.
B3.20 Materials and Material Stockpiles	Leachate from stockpiles must be prevented from entering the soil. Measures to ensure this may include the placing of wooden platforms, a layer of sand and casting a concrete screed or brick paving cover	Not Assessed	This requirement was not assessed by the auditor as all stockpiles had been removed from site during the final environmental audit. This items was not noted within the ECO reports.

B3.20 Materials and Material Stockpiles	Dust from the stockpile sites may be a problem. As dealt with under the dust control section of this document stock piles may need to be covered as a dust control measure	Full Compliance	No dust from the stockpiles was noted by the ECO.
B3.20 Materials and Material Stockpiles	Stockpiles may not exceed 2 m in height	Full Compliance	No stockpiles exceeding 2m in height noted by the ECO.
B3.20 Materials and Material Stockpiles	Excavated materials, not earmarked for re-use on site, shall be stockpiled in a manner approved by the PM and ECO until removal from site	Not Assessed	No excavated materials noted within the ECO reports or observed during the final environmental audit.
B3.20 Materials and Material Stockpiles	Care must be exercised not to import construction or re-vegetation materials containing weeds and invasive plant seeds or exotic fauna. The ECO and PM shall be informed of the sources of all construction materials imported to site and shall be given sufficient time to check the suitability of such material and shall have the authority to reject the material if deemed necessary	Full Compliance	None noted by the ECO.
B3.21 Concrete and Cement Batching	Concrete and mortar may not be mixed directly on the ground. Concrete mixing must be carried out on an impermeable surface (such as on boards and/or within a bunded area with an impermeable surface) or make a hard surface and remove when done	Material Non-Compliance	<p>No cement batching was underway at the time of the final environmental audit. The 4th and 6th ECO report notes that cement batching took place on the bare ground. This was rectified by the following inspection. This was notified once again within the 19th and 20th ECO reports.</p> <p>The 17th ECO report noted that cement batching took place on an impermeable surface, however some cement spilled over onto the bare ground surrounding the impermeable surface. This was noted once again in the 18th ECO report.</p> <p>The Contractors generally closed the non-compliances out in a timeous fashion, however it is noted that this item is a repeat non-compliance.</p>
B3.21 Concrete and Cement Batching	Concrete mixing areas must be fitted with a containment facility for the collection of cement laden water. This facility must be impervious to prevent soil and groundwater contamination	Not Assessed	No cement batching was underway at the time of the final environmental audit. No cement laden water was collected to the knowledge of the auditor.
B3.21 Concrete and Cement Batching	The concrete batching activity shall be located in an area of low environmental sensitivity to be	Full Compliance	No cement batching in sensitive areas was noted by the ECO.

	identified and approved by the Project Manager/ Engineer and ECO		
B3.21 Concrete and Cement Batching	Bagged cement must be stored in an appropriate facility protected from rain and wind	Not Assessed	The location of cement bag storage was not noted within the ECO reports.
B3.21 Concrete and Cement Batching	Contractors shall construct and operate a facility to collect runoff from the mixing area and water used to wash equipment containing cement or concrete and prevent it from entering the environment or damaging any component of previously constructed infrastructure	Not Assessed	No collection of runoff noted by the ECO.
B3.21 Concrete and Cement Batching	Hardened concrete from the washout facility or concrete mixer can either be reused or disposed of at an appropriate licenced disposal facility	Not Applicable	No washout facility was established to the knowledge of the auditor.
B3.21 Concrete and Cement Batching	Empty cement bags must be secured and placed in wire cages for temporary storage on site	Material Non-Compliance	<p>The 4th, 6th, 10th, 16th, 19th, 20th and 31st ECO report noted that empty cement bags were not adequately disposed of. The cement bags were left on the ground on site The 9th ECO report once again noted that empty cement bags were not adequately disposed of. Empty cement bags appeared to be stacked adjacent to the waste bins.</p> <p>It was noted within the 36th ECO report that cement bags were disposed of in a general waste skip instead of being disposed via the appropriate hazardous waste stream.</p> <p>The Contractors generally closed the non-compliances out in a timeous fashion, however it is noted that this item is a repeat non-compliance.</p>
B3.21 Concrete and Cement Batching	Large scale batching of concrete and cement by means of silo storage of loose cement and automated, computer-controlled batching, should be investigated, to minimise waste and dust pollution	Not Applicable	No large scale batching noted by the ECO.
B3.21 Concrete and Cement Batching	Silo batching plants must be properly managed to prevent dust generation	Not Applicable	No silo batching plants noted by the ECO.
B3.22 Dust Control	The creating of nuisance/precipitant dust is controlled by the National Dust Control Regulations (R.827, 1 November 2013) promulgated under the	Full Compliance	No dust nuisance noted by the ECO.

	National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEM:AQA). The contractor will ensure that the specifications of these regulations are met		
B3.22 Dust Control	Specifications for dust control in the City of Cape Town Air Quality Management By-Law 2016 dated 17 August 2016 must also be followed	Full Compliance	No dust nuisance noted by the ECO.
B3.22 Dust Control	Removal of vegetation must be avoided until such time as soil stripping is required and similarly exposed surfaces must be re-vegetated or stabilised as soon as is practically possible	Full Compliance	Vegetation removal occurred at the commencement of the project. All exposed areas were developed and re-vegetated across a length of time. To the knowledge of the auditor, areas remained exposed for long durations before being build upon, however this was not noted to cause dust nuisance as mulch and straw were utilized for stabilization.
B3.22 Dust Control	Sand stockpiles are to be covered with hessian, shade cloth or DPC plastic	Not Applicable	No covering of stockpiles noted, however mulch and straw were utilized for stabilization.
B3.22 Dust Control	Stockpiles are to be located in sheltered areas and the usable/cut face orientated away from the direction of the prevailing wind for that season	Not Applicable	No sheltering of stockpiles noted, however mulch and straw were utilized for stabilization.
B3.22 Dust Control	Excavating, handling or transporting erosion prone materials in high wind or when dust plumes are visible shall be avoided	Full Compliance	No dust generation has been noted due to the excavating, handling or transporting of erosion prone materials.
B3.22 Dust Control	If high winds prevail the PM shall decide whether water dampening measures or cessation of activities is required, and if necessary he shall have the authority to temporarily stop certain of the works until wind conditions become more favourable	Full Compliance	Various dust suppression measures were available on site for the duration of the project.
B3.22 Dust Control	Water dampening shall be done with non-potable water. Arrangements must be made with the WWTW to obtain purified water for this purpose. Water trucks must be used and not irrigation sprayers. Evaporation from the latter systems are too high	Not Applicable	For the most part, mulch and straw stabilisation was utilized as dust suppression measures.
B3.22 Dust Control	Straw stabilisation must be applied at a rate of one bale/10m ² and harrowed into the top 100 mm of top material, for all completed earthworks	Full Compliance	Straw was appropriately utilized for dust suppression.

B3.22 Dust Control	For significant areas of excavation or exposed ground, wet areas with non-potable water using trucks to minimise the spread of dust	Technical Non-Compliance	During vegetation clearing, the ECO noted that no dust mitigation measures had been put into place as clearing is a high risk of dust generation. This was rectified by the 2 nd ECO inspection as wetting was undertaken to minimise dust generation.
B3.22 Dust Control	The use of angle grinders to cut paving stones and chase electrical installations, generate local plumes of dust. Containment of this dust must be considered if necessary, by cutting all paving bricks in a shade cloth enclosure	Not Applicable	No use of angle grinders noted.
B3.22 Dust Control	Vehicle speeds shall not exceed 40km/h along gravel roads or 25km/h on unconsolidated or non-vegetated areas	Not Assessed	No note was made of vehicle speeds or speed limit signage.
B3.22 Dust Control	Dust plumes created by vehicle movement are to be monitored	Full Compliance	No dust generated on site.
B3.22 Dust Control	If access roads are generating dust beyond acceptable levels dust suppression measures must be initiated. These include, but are not limited to the following: Reduction of travelling speeds along the roads. Restriction of vehicle or plant usage. Application of chemical soil binders. Application of suitable sacrificial road surfacing.	Full Compliance	No excess dust generation noted on site.
B3.22 Dust Control	If water is to be used for dust suppression on haul roads, then only the critical areas should be watered	Full Compliance	No unnecessary or excess watering noted by the ECO.
B3.22 Dust Control	Watering of haul roads is to be supervised to prevent unnecessary wastage, and runoff into potentially sensitive areas such as the conservation area	Full Compliance.	Water dampening was undertaken on site.
B3.22 Dust Control	Water dampening shall be done with non-potable water	Not Assessed	Water dampening was undertaken on site, however it was not noted whether non-potable water was used.
B2.23 Site Clean Up and Rehabilitation	The Contractor shall ensure that all temporary structures, equipment, materials, waste and facilities used for construction activities are decommissioned and removed upon completion of the activity	Full Compliance	It was noted in the final ECO report that all equipment and materials had been removed from site. The site had been appropriately cleaned. During the final environmental audit, Chand noted that the site appeared to be left in a good condition. No construction equipment or materials were observed. Small maintenance teams were observed on site, however these teams worked in designated areas and kept minimal materials on hand. A team of painters was

			observed who worked inside the newly constructed housing units. A fencing team was observed installing fencing panels around a water storage system.
B2.23 Site Clean Up and Rehabilitation	The Contractor shall clear and clean the construction site to the satisfaction of the PM upon completion of the construction phase	Full Compliance	The site appeared tidy during the final environmental audit. No litter was noted within the final ECO report.
B2.23 Site Clean Up and Rehabilitation	Compacted soil shall be ripped and hand-trimmed. Topsoil shall then be spread evenly over the surface if required	Full Compliance	All areas were appropriately rehabilitated and no compacted soil was observed.
B2.23 Site Clean Up and Rehabilitation	All areas disturbed by construction activities within the demarcated site, storage and stockpiling areas, etc. shall be rehabilitated and/or landscaped to the satisfaction of the PM, in accordance with the Landscaping Plan	Full Compliance	All areas were appropriately rehabilitated at the time of the final environmental audit.
B2.23 Site Clean Up and Rehabilitation	No construction equipment, vehicles or unauthorised personnel shall be allowed onto areas that have been re-vegetated	Full Compliance	No construction equipment, vehicles or unauthorised personnel observed on vegetated areas.
B2.23 Site Clean Up and Rehabilitation	All revegetation work must be done in accordance with the approved Landscape Plan. The Landscape Architect and Landscape Contractor shall be intimately involved with re-vegetation	Not Assessed	This requirement was not assessed as the Landscaper Plan was not provided to the auditor.
B2.23 Site Clean Up and Rehabilitation	The timing of re-vegetation shall take cognizance of maintenance requirements and provision shall be made for any irrigation requirements	Full Compliance	At the time of the final environmental audit all revegetation had taken place with irrigation measures installed.
B2.23 Site Clean Up and Rehabilitation	The No-go status of the conservation area must be strictly observed. No rehabilitation work to be undertaken in the reserve. This area will be managed in accordance with the specially prepares Conservation Management Plan. This plan will be executed under guidance of the botanist or another qualified expert	Full Compliance	The no-go area remained adequately demarcated and appeared untouched during the final environmental audit.
B3.24 Noise Control	Hours of operation shall be in accordance with National Building Regulation F6 namely 06h00 to 18h00 on weekdays and 06h00 to 17h00 on Saturdays. Construction activities outside these hours will only be allowed after approval by the Local Authority. No construction activities may occur on Sundays and public holidays	Not Assessed	Hours of operation was not communicated to the auditor, however no after-hours work was communicated.

B3.24 Noise Control	The Contractor shall be responsible for compliance with the Western Cape Noise Control Regulations, 2013 and all other relevant legislation with respect to noise	Full Compliance	No noise related non-compliances were noted by the ECO throughout the construction phase.
B3.24 Noise Control	The Contractor shall, warn any local communities and residents that could be disturbed by noise generating activities, such as blasting or piling, well in advance and shall keep such activities to a minimum	Not Assessed	No noise disturbance noted within the ECO reports as well as no proof of communications being provided to the auditor.
B3.24 Noise Control	A well planned and coordinated "fast track" procedure must be implemented to complete noisy construction process in the shortest possible time	Not Assessed	No "fast track" procedure noted.
B3.24 Noise Control	All plant, equipment and vehicles are to have effective silencers/mufflers fitted that would otherwise cause a noise level exceeding 85dB	Not Assessed	No mention of silencers/mufflers noted within the ECO reports. All plant, equipment and vehicles had been removed from site at the time of the final environmental audit.
B3.24 Noise Control	No sound amplification equipment (hooters, loud music speakers, sirens etc.) is to be used on site except in emergencies	Full Compliance	No noise related non-compliances were noted by the ECO throughout the construction phase.
B3.24 Noise Control	Unavoidable after hours work such as continuous pouring of concrete decks and floors must be cleared with, and permission obtained from, the City of Cape Town	Not Applicable	No after-hours work communicated to the auditor.
B3.24 Noise Control	Noise levels must comply with the Code of Practice SANS 100103 – 2008	Full Compliance	No noise related non-compliances were noted by the ECO throughout the construction phase.
B3.25 No-Go Areas	Identification of No-Go areas is to be informed by the environmental assessment and any additional areas identified by the ECO during development	Full Compliance	The no-go areas were specified by the ECO and demarcated by the Contractors.
B3.25 No-Go Areas	The boundaries of the conservation area must be pegged by a land surveyor and a permanent fence erected of the type and kind as specified in the Landscape Plan. The fencing must further be done as per the directions under Par B3.7 above	Not Assessed	This requirement was not assessed as the landscaping plan was not provided to the auditor. No mention of this requirement was made in the ECO reports; however it was noted that the area was adequately demarcated for the duration of the construction phase with no environmental degradation of the area noted.
B3.25 No-Go Areas	Erect, demarcate and maintain a temporary fence around the perimeter of any other No-Go area	Full Compliance	All no-go areas were adequately demarcated for the duration of the construction phase.
B3.25 No-Go Areas	Unauthorised access and development related activity inside No-Go areas is prohibited	Full Compliance	No evidence of disturbance in the no-go areas were noted in the ECO reports.

B3.26 Heritage Resources	If any archaeological remains (including but not limited to fossil bones and fossil shells, coins, indigenous and/or colonial ceramics, any articles of value or antiquity, stone artefacts and bone remains, structures and other built features, rock art and rock engravings) are discovered during construction the PM and also the ECO must be notified on their 24 hour contact numbers. The latter shall immediately inspect and secure the site to stop all further interference and inform Heritage Western Cape (Mr Guy Thomas 021 4839685) and the South African Heritage Resources Agency (Ms Colette Scheermeyer 021 4624502). A joint decision shall then be taken regarding future actions	Not Applicable	No heritage resources found for the duration of the construction phase. The ECO reports noted that environmental training was conducted on the 22nd of July 2021 as well as on the 20th January 2022, during which the ECO explained the correct protocols if any heritage resources are discovered.
B3.26 Heritage Resources	The Contractor may not, without a permit issued by the relevant heritage resources authority, destroy, damage, excavate, alter, deface or otherwise disturb archaeological material	Not Applicable	No heritage resources found for the duration of the construction phase.
GENERAL MATTERS			
B4.1 Management of Storm Water	The Storm Water Management Plan for this project must be followed. There are no natural wetlands on site but the storm water attenuation system consists of road runoff and a piped system to the detention pond. Practical temporary measures must be implemented during the construction phase to channel storm water away from newly constructed infrastructure.	Not Assessed	This was not assessed by the auditor as the Storm Water Management Plan was not provided. Provisions for stormwater management were made in the final construction of the estate, with a detention pond as well as the various stormwater drains were observed by the auditor.
B4.2 Waste Minimization during construction	<p>Material Selection</p> <p>The developer will, for as far as it is economically feasible, select materials for least waste generation during preparation and use during construction. Materials used in the construction which are durable in order to minimise maintenance or replacement. Standard materials to increase re-use/recycling potential. Materials which are sourced locally.</p> <p>Pre-fabrication</p>	Full Compliance	<p>The auditor was not appointed for the duration of the construction phase and therefore cannot comment on the material selection, pre-fabrication, loading and unloading, storage of materials or use of temporary structures.</p> <p>The Contractors maintained a method statement for solid waste management. No evidence of illegal dumping was noted within the ECO reports.</p> <p>Refuse bins were kept on site and were kept in a designated area in the site camp. No evidence of waste being burnt on site was observed or noted within the ECO reports.</p>

The developer will, for as far as it is economically feasible make use of pre-fabricated components in order to minimise waste on site and permit re-use by the manufacturers of any waste generated during construction of the units.

The developer will strive to order materials "just-in-time" to avoid deterioration/ breakage during storage The developer will strive to (as far as reasonably possible) order materials only from suppliers which will take back any unused/off-spec or broken materials.

The developer will strive to (as far as reasonably and economically possible) order materials in bulk to reduce packaging but without over-ordering resulting in waste generation. Suppliers which take back the packaging will be favoured by the developer.

Load and unloading

The construction site staff will be trained to load and unload materials correctly to avoid breakage and wastage.

Storing of materials

Care will be taken to ensure that materials are stored appropriately according to supplier specifications to reduce the risk of damage or deterioration.

The use of temporary structures

The developer will attempt to keep temporary structures on site to a minimum.

Where unavoidable the temporary structures used on this site, will be re-used on other sites.

General

Contractors must provide and maintain a method statement for "solid waste management". The method statement must provide information on

	<p>proposed licensed facility to be utilised and details of proposed record keeping for auditing purposes. Any illegal dumping of waste will not be tolerated. Proof of legal dumping must be produced on request.</p> <p>Bins must be clearly marked for ease of management. All refuse bins must have a lid secured so that animals cannot gain access.</p> <p>The waste must be stored in dedicated areas. Under no circumstances must any waste be burnt. All waste must be disposed of at a registered site. It is the Developer's and PM's responsibility to ensure that the contracted party responsible for waste disposal disposes of the waste at the correct facility.</p> <p>The ECO shall monitor the above activities and report in regular monitoring reports.</p>		
B4.3 Site Closure and Holiday Periods	<p>Contractors shall make adequate arrangements for the period that the construction site remains closed during the holiday or other non-working periods.</p> <p>Monitoring: A temporary closure report is to be submitted to the ECO in these instances. The latter to include the temporary closure report in regular monitoring reports.</p> <p>All stores (especially the hazardous substance storage sites) shall be secured; all sumps and collection pits shall be emptied and their contents removed; all sand, cement, top soil and fines shall be adequately covered to protect these stockpiles from wind and rain. Contractors shall establish a system whereby they can be notified immediately should any emergencies arise during the holiday or non-working period. Any emergencies on site shall be addressed immediately.</p>	Material Non-Compliance	No arrangements for the non-working periods were noted within the ECO reports. No temporary closure reports were provided to the auditor.
B4.4 Storm Conditions	Contractors shall ensure that any sumps/settling ponds etc. are emptied when necessary,	Not Applicable	No mention of any sumps/settling ponds were made within the ECO reports. No wastewater issues were identified by the ECO.

	<p>especially during rainy periods, to prevent their contents overflowing and polluting the general environment. Contractors shall set up a procedure for Emptying any collection points rapidly should they be in danger of overflowing. Contractors may consider covering collection points to prevent their filling with rainwater.</p> <p>Contractors shall also ensure that rainwater does not run off areas containing oil, diesel cement sludge etc. and thus result in a pollution threat. Stockpiles of fine materials, such as sand, top soil, cement etc. must also be protected from rain, runoff and wind.</p>		
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MONITORING PROCEDURES

<p>B5.1 Monitoring</p>	<p><i>Section 34 of the NEMA EIA Regulations, 2014 (as amended) states that "the holder of an environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid –</i></p> <p><i>(a) ensure that the compliance with the conditions of the environmental authorisation and the EMPr is audited; and</i></p> <p><i>(b) submit an environmental audit report to the relevant competent authority."</i></p> <p>Monitoring is an important tool in determining the effectiveness of management actions by measuring changes in the environment. These could be in the form of regular photography where an area is photographed on a regular basis to record construction activities. The most important aspect of any monitoring programme is consistency and continuity.</p> <p>Photographs as part of the ECO monthly reporting must be used during construction and operation for this development. The identified site must provide a representational angle that will capture the development progress and must include any sensitive areas to monitor impacts.</p>	<p>Material Non-Compliance</p>	<p>The holder ensured that compliance of the EMPr was audited through the ECO who provided fortnightly ECO reports. The ECO kept photographic records of progress on site, which can be seen at the end of each ECO report. The ECO did not audit conditions noted within the EA.</p> <p>No proof of audit reports being submitted to the competent authority was provided to the auditor.</p>
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	Photographs must be taken during construction at each ECO site visit.		
B5.2 Monitoring Frequency	The Developer, PM and Contractor(s) are responsible for monitoring all construction activities on a day- to-day basis to ensure compliance with the EMPr and EA, throughout the construction phase of the development. The ECO will undertake between 1 to 2 site visits per month to monitor compliance with the EMPr. The ECO will compile an Environmental Inspection Report once per month. This report will be submitted to the PM, Contractor, Developer and DEA&DP and the Environmental Management Officials of the Local Authority. The report will concentrate on environmental aspects relating to the construction phase of the project.	Material Non-Compliance	The ECO undertook two inspections per month and monitored compliance through ECO reports. No monthly reports were provided to the auditor or proof of submission of such reports.
B5.3.1 Documentation on Site	<p>The documentation listed below must be kept on site in the form of an Environmental File, in order to record compliance with the EMPr.</p> <ul style="list-style-type: none"> • Copy of the EMPr; • Copy of the EA; • Copy of other licences/permits/approvals; • Environmental Method statements compiled by the Contractor; • Non-conformance Reports; • Communications Register—including records of Complaints, and, minutes and attendance registers of all environmental meetings. • Monitoring Results – including environmental monitoring reports, register of audits, Non Conformance Reports (NCR). • Incident book – including copies of notification of Emergencies and Incidents, this must be accompanied by a photographic record. • Waste Documentation such as Waste Disposal Receipts; 	Material Non-Compliance	<p>The ECO reports kept minimal record of documentation which was kept on site. The following documents were noted to be on site, as per the ECO reports:</p> <ul style="list-style-type: none"> • Chemical toilet receipts; • Waste service slips; • Rubble removal slips; and • A complaints register. <p>The 47th ECO report noted that no MSDS were observed within the site camp. In addition, the ECO reports made no note of the following documents being noted on site:</p> <ul style="list-style-type: none"> • A copy of the EMPr; • A copy of the EA; • Environmental Method Statements; • Non-conformance reports; • Minutes and attendance registers of all environmental meetings; • Monitoring results – environmental monitoring reports, register of audits, non-conformance reports; • Incident book- copies of notification of emergencies and incidents; • Dust suppression measures register; and • Written corrective action instructions.

	<ul style="list-style-type: none"> • Material Safety Data Sheets for all hazardous substances; • Dust suppression measures register. • Written Corrective Action Instructions; and • Notification of Emergencies and Incidents. 		
B5.3.2 Environmental Complaints	<p>All complaints of an environmental nature by parties not directly linked to the project shall be recorded by the PM before handing it over to the ECO to deal with it. The PM must record:</p> <ul style="list-style-type: none"> • The nature of complaint/incident. • The causes of complaint/incident. • The party/parties responsible for causing the incident leading to the complaint. • Immediate actions undertaken to stop/reduce/contain the causes of the complaint or incident. <p>The complaint will then be handed over to the ECO to deal with.</p> <ul style="list-style-type: none"> • The ECO will contact the complainant as soon as possible and arrange a meeting if necessary to discuss their complaint. • The ECO will then meet with the PM to jointly devise additional corrective or remedial action taken and/or to be taken to address and to prevent reoccurrence of the complaint/incident. Timeframes and the parties responsible for the implementation of the corrective or remedial actions. Procedures to be undertaken and/or penalties to be applied if corrective or remedial actions are not implemented. • The ECO will inform the complainant in writing of how his/her complaint is being dealt with and invite a response as to the complainant's perception of the effectiveness of the measures taken. 	Not Applicable	A complaints register was kept in the environmental file, however no complaints were received for the duration of the construction phase.

	<ul style="list-style-type: none"> • The ECO will keep records of all complaints as part and parcel of his/her reporting system. • Copies of all complaints and remedial action taken will be forwarded by the ECO to the PM to be included in the Complaints Register. 		
RECORD OF ACTIVITIES, NON-CONFORMANCE AND CORRECTIVE ACTION			
B6.1 Non-Conformance	<p>A Non-Conformance Report (NCR) will be issued to the Contractor as a final step towards rectifying a failure in complying with a requirement of the EMPr. The ECO will issue the NCR in writing only after the Contractor has been given an opportunity to rectify the matter.</p> <p>Should the ECO assess an incident or issue and find it to be significant (e.g. non-repairable damage to the environment), it will be reported to the relevant authorities and immediately escalated to the level of a NCR. The following information should be recorded in the NCR:</p> <ul style="list-style-type: none"> • Details of the non-conformance; • Any plant or equipment involved; • Any chemicals or hazardous substances involved; • Work procedures not followed; • Nature of the risk. • Actions agreed to by all parties following consultation to adequately address the nonconformance in terms of specific control measures and should take the hierarchy of controls into account. • Agreed timeframe by which the actions documented in the NCR must be carried out. • ECO should verify that the agreed actions have taken place by the agreed completion date, when completed satisfactorily; 	Not Applicable	To the knowledge of the auditor, no NCRs have been issued. All non-compliances were noted within the fortnightly ECO reports and were generally dealt with in a timeous fashion.

	<ul style="list-style-type: none"> The ECO and Contractor should sign the Close-Out portion of the Non-Conformance Form and file it with the contract documentation. 		
B6.2 Fines	<p>Fines will be issued for the transgressions listed in the EMPr. Fines may be issued per incident at the discretion of the PM. Such fines will be issued in addition to any remedial costs incurred as a result of non-compliance with the environmental requirements of the EMPr.</p> <p>The PM will inform the Contractor of the contravention and the amount of the fine and will deduct the amount from monies due under the Contract. Such fines will be paid by the Contractor to the Developer. The monies will be deducted under the contract value.</p> <p>Any fines imposed must be paid over to a conservation NGO operating in the area.</p> <p>Contractors/ subcontractors will be liable for transgressions by their staff while the latter are on site.</p> <p>Professional consultants and their staff, while working and operating on site, are also subject to the system of fines and penalties.</p> <p>For each subsequent similar offence, the fine may be doubled in value to a maximum value of R50 000. The PM may also stop works.</p> <p>Where the Contractor inflicts non-repairable damage upon the environment or fails to comply with any of the environmental specifications, he/she shall be liable to pay a penalty over and above any other contractual consequence. Where a Contractor causes damage, the Developer can either enforce a penalty or make the Contractor make good the damage, but not both.</p>	Not Applicable	To the knowledge of the auditor, no fines were issued to the Contractors.
AUDITS			

B7.2 Final Environmental Audit	The holder of the EA (e.g. the Developer) must, for the period during which the environmental authorisation and EMPr, remain valid ensure that the compliance with the conditions of the environmental authorisation and the EMPr is audited; and submit an environmental audit report to the relevant competent authority.	Full Compliance	The holder of the EA has appointed Chand Consultants to undertake the final environmental audit. The final environmental audit will be submitted to the competent authority.
B7.2 Final Environmental Audit	<p>Section 34 of the EIA Regulations GN 982 of 4 December 2014 (as amended) regulates the requirements for an environmental audit report. Such a report must—</p> <ul style="list-style-type: none"> (a) be prepared by an independent person with the relevant environmental auditing expertise; (b) provide verifiable findings, in a structured and systematic manner, on <ul style="list-style-type: none"> (i) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation or EMPr and, where applicable, the closure plan; and (ii) the ability of the measures contained in the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity; (c) contain the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended); and (d) be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation. 	Full Compliance	<ul style="list-style-type: none"> (a) The report was prepared by Taryn Brickhill of Chand Consultants. Chand is an independent entity. The expertise of the author, Taryn Brickhill, can be seen in Table 1 above. (b) Findings are provided in a report format which comments on the level of performance as well as measures contained in the EMPr. (c) The report contains all information as set out in Appendix 7 of the EIA Regulations, 2014 (as amended). (d) The report has been conducted and submitted as per the EA.

B7.2 Final Environmental Audit	<p>The environmental audit report must determine—</p> <p>(a) the ability of the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and</p> <p>(b) the level of compliance with the provisions of environmental authorisation, EMPr and where applicable, the closure plan.</p>	Full Compliance	This report notes the EMPr's ability to manage environmental impacts as well as the level of compliance with the EMPr.
B7.2 Final Environmental Audit	<p>Where the findings of the environmental audit report indicate—</p> <p>(a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or</p> <p>(b) insufficient levels of compliance with the environmental authorisation or EMPr and, where applicable the closure plan; the holder (e.g. the Developer) must, when submitting the environmental audit report to the competent authority, submit recommendations to amend the EMPr in order to rectify the shortcomings identified in the environmental audit report.</p>	Full Compliance	It is understood that the Contractors have concluded with works on site. Should any amendments be deemed necessary, it is to be submitted by the holder.
B7.2 Final Environmental Audit	<p>When submitting recommendations, such recommendations must have been subjected to a public participation process, which process has been agreed to by the competent authority and was appropriate to bring the proposed amendment of the EMPr and, to the attention of potential and registered interested and affected parties, including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the competent authority, for approval by the competent authority.</p>	Not Assessed	This activity is to be undertaken following the submission of this report.

	<p>Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available—</p> <p>(a) to anyone on request; and</p> <p>(b) on a publicly accessible website, where the holder has such a website.</p>		
OPERATIONAL PHASE			
C2 Socio-Economic Measures	<ul style="list-style-type: none"> The design and construction architects and engineers are to ensure that building designs and fittings comply with energy efficient designs, reduce water usage and minimise visual impacts. Landscape architects are to ensure that landscape features are appropriately designed and implemented to maximise pleasant vistas and minimise intrusive visual impacts of the development. Avoid NEMBA: AIS Regulations listed plant species and use water-wise indigenous plants. The HOA must ensure that residents adhere to estate guidelines in respect of littering, recycling, sparing use of energy and water, guidelines for the keeping of pets and domestic animals such as poultry and pet and animal hygiene. Driving regulations, especially speed limits, within the development precinct must be adhered to. 	Full Compliance	<ul style="list-style-type: none"> The design of the buildings did not have any undesired visual impacts. All landscaping was completed at the time of the final environmental audit. No intrusive visual impacts due to landscaping was noted. An HOA Architectural Rules and Guidelines document has been implemented on the estate. The document states that attention should be given to housekeeping and good housekeeping practices should be implemented. These guidelines appear to be aimed towards Contractors who should be employed by residents during the operational phase. No regulations have been put in place with regards to the use of energy and water or keeping of pets. The HOA Architectural Rules and Guidelines states that the speed limit within the estate is 30km/h and should be strictly adhered to. No speed limit signage was observed within the estate during the final environmental audit.
C3.1 Landscaping of private gardens, public open spaces,	<ul style="list-style-type: none"> All landscaping of public areas must be done in accordance with the approved landscape plan. As far as possible and feasible use indigenous vegetation during landscaping Kikuyu grass should not be used for lawns, 	Not Assessed	<ul style="list-style-type: none"> The landscaping plan was not provided to the auditor. The vegetation type was not noted by the ECO nor was the auditor able to identify. To the auditor's knowledge, no kikuyu grass has been utilized for public spaces or private gardens.

detention pond environment	<p>both in public spaces and private gardens. Only buffalo grass or other suitable indigenous grasses should be used.</p> <ul style="list-style-type: none"> The detention pond area must be dealt with as proposed in the Storm Water Management Plan. The Stormwater detention pond must be recognized as an important habitat for biodiversity and therefore appropriate vegetation and ongoing maintenance of the pond is required to maximise this ecological unit. The developer must maintain newly vegetated stormwater attenuation & treatment facilities for a period of 12 month, until fully established and formally signed over to the Property Owners' Association. This includes trimming, fertilizing, irrigation, and plant propagation where necessary. All cost incurred is for the developer's account. 		<ul style="list-style-type: none"> The Storm Water Management Plan was not provided to the auditor therefore this requirement could not be assessed. The stormwater attenuation pond was established at the time of the final environmental audit. The pond appeared to be well maintained
C3.2 Energy during operation	<ul style="list-style-type: none"> The architects must incorporate energy efficient building designs, to minimise heat losses and gains. Passive environmental control should be strived for. This approach is characterised by maximum use of ambient resources such as sun, daylight, wind and diurnal temperature ranges to create comfortable internal environments. Buildings are designed to work with these resources and avoid the use of mechanical systems. Measures can also be taken to reduce energy consumption in a residential setting. For instance, gas stoves, more efficient lighting, geyser blankets, pipe insulation to wrap around hot water delivery pipes, geyser timers to automatically switch geysers off at certain times thus providing hot water when 	Full Compliance	<ul style="list-style-type: none"> It was noted that all options for energy efficiency was considered during the design phase. Window sizes, roofing type, roofing insulation were all considered and implemented wherever possible. Window sizes were carefully considered to ensure that natural daylight was utilized. It was noted that all options for energy efficiency was considered during the design phase. Water saving taps and solar panels for geysers were all considered and the appropriate measures were implemented wherever possible. Outdoor lights are manually controlled. No security beams were noted within the conservation area. A fair amount of natural daylight was noted within the buildings.

	<p>needed, heat pumps and solar water heating systems substantially reduce energy costs. The capital costs of these technologies can be justified through reduced annual energy costs. Thermal insulation of roofs and ceilings are standard practices.</p> <ul style="list-style-type: none"> • Outdoor lights should be controlled by movement sensors where applicable. • No security beams will be allowed on the conservation area side of the boundary fence. No outdoor lighting from the property may be angled into the conservation area to cause light pollution. • Natural light should be introduced into buildings to augment and replace electric lighting systems in buildings during daylight hours. Quality of daylight and access to views should therefore be included as important design considerations. 		
C3.3 Use of pesticides, herbicides and insecticides in the estate	<ul style="list-style-type: none"> • Pesticides should be avoided but when necessary should be used with circumspection. No pollution of surface and ground water should occur. Certain pesticides are toxic to aquatic life. Label instructions should be read and followed. • The HOA should exercise control over these substances and proper storage, use and disposal of Empty containers should be enforced. Such chemicals must be stored in appropriate lockable stores. Empty containers should not be placed in the domestic waste stream, but separately disposed of at a registered disposal facility. • Pesticide, herbicides and insecticides should have low environmental toxicity. Short half-lives and high absorption rates. • Pesticides should be loaded and off-loaded, mixed and equipment cleaned in 	Not Applicable	<p>These requirements were not applicable at this stage as pesticides, herbicides and insecticides were observed during the final environmental audit.</p> <ul style="list-style-type: none"> • No use of pesticides was observed by the auditor. No pollution of surface or ground water was observed during the final environmental audit. • No substances were observed during the final environmental audit. • No pesticides, herbicides or insecticides were observed during the final environmental audit. • No pesticides were observed during the final environmental audit. • No fertilizers were observed during the final environmental audit.

	<p>a designated area where spills can be contained and cleaned up.</p> <ul style="list-style-type: none"> Organic fertilizers and compost should preferably be used, but if chemical fertilizers are for some reason called for, it be the slow release type. 		
C3.4 Indigenous fauna in the estate	<ul style="list-style-type: none"> On estates like La Vignia, bordering on rural farm land, snakes, tortoises, moles, other small wild animals and birds, will from time to time be found in gardens, open spaces and along road verges. These animals should preferably be tolerated in the estate but if unwanted, must not be harmed and physically removed from the properties and relocated to an appropriate site (e.g. the conservation area). Removal or relocation of animals to the conservation area must be done by a faunal specialist. 	Not Applicable	<ul style="list-style-type: none"> To the knowledge of the auditor, no animals were found on the estate. No removal or relocation has been deemed necessary as no animals were found on the estate.
C3.5 Keeping management of domestic animals	<ul style="list-style-type: none"> The HOA must include a section in the constitution to regulate the keeping of domestic pets. Cats and dogs can be very destructive of small wild life. Dogs should be walked on leashes and faeces picked up in a plastic bag. The HOA must regulate or ban the keeping of poultry and other domesticated animals such as rabbits 	Not Assessed	The HOA constitution was not provided to the auditor.
C3.6 Monitoring and maintenance of the storm water system	<ul style="list-style-type: none"> All storm water channels must be inspected regularly to ensure that they are not blocked and/or obstructed to ensure their efficient operation and reduction in flooding risk; Ensure that the storm water litter and silt traps are continuously maintained; Avoid pollution of the storm water system and subsequent receiving systems, including the detention pond; 	Full Compliance	<ul style="list-style-type: none"> All stormwater channels were clear. No inspections were communicated to the auditor. During the final environmental audit, the auditor noted that some storm water litter and silt traps contained a large amount of silt and vegetative offcuts. No pollution of the stormwater systems was observed during the final environmental audit. No education or training of residents was noted. No erosion and weed control needed at this stage as construction had recently concluded.

	<ul style="list-style-type: none"> As far as possible residents, tenants and staff must be educated to ensure that no materials, fluids or substances are allowed to enter the storm water system that could have a detrimental effect on the flora, fauna and aquatic life in the attenuation dam. Edge effects on the conservation area of activities including erosion and alien/weed control need to be strictly managed; and Monitor the storm water channels for erosion and maintain the vegetated and reinforced banks. 		<ul style="list-style-type: none"> No erosion noted during the final environmental audit.
C3.7 Institute measures to minimise potable water use	<ul style="list-style-type: none"> Use water wise indigenous gardening as part of the landscape plan. The architects should specify low flow shower heads and taps in all the buildings. Rain water harvesting should be an active measure designed into the buildings and residences. It should not be an afterthought. An alternate source of irrigation water (such as purified sewerage water and/or a borehole) should be actively sought. 	Not Assessed	<p>These requirements were not assessed as the auditor was not able to determine whether vegetation planted was water wise, which showerheads were utilized or whether rain water is being utilized.</p> <p>The auditor observed a borehole pump and large water tanks on the estate. No water use license was provided for the borehole. The water is to be utilized for irrigation purposes.</p>
C3.8 Waste management, minimisation and recycling	<ul style="list-style-type: none"> Integrated waste management must be introduced by the HOA that is based on waste minimisation and must include reduction, recycling, re-use and disposal where appropriate. The HOA should introduce a waste recycling system, encouraging residents to separate plastic, paper, tins, and bottles into different containers and, importantly, ensuring that the sorted items get into the recycling stream. Organic waste in the development should be composted and used as fertilizer and topdressing. 	Full Compliance	<ul style="list-style-type: none"> Refuse rooms were established on the estate and housed all waste receptacles. No recycling was observed during the final environmental audit. Organic waste was disposed of in the waste receptacles designated for general household waste.

C3.9 Prevention of dust	<ul style="list-style-type: none"> Dust is normally associated with the construction phase. In an established estate dust should no longer be an issue. Should open spaces or building sites be temporarily exposed, various methods such as covering with straw, wetting with non-potable water, use of shade cloth, planting of vegetative cover and use of mulching may be used. No noise nuisance or disturbing noise may be created during building phase of the development as defined in the Western Cape Noise Control Regulation P.N. 200/2013. In this regard all noise producing equipment must be adequately muffled during the construction process. 	Full Compliance	<ul style="list-style-type: none"> No dust was noted during the final environmental audit. No noise nuisance was noted during the final environmental audit.
C3.10 Control of alien invasive plant species	<ul style="list-style-type: none"> The only listed invasive species on the property at present is the Port Jackson Willow (<i>Acacia saligna</i>). Within the estate (outside the conservation area) these plants must be removed by hand-cutting the stems and poisoning the stumps whenever these plants appear in public areas or at the detention pond. Follow-up would be required to remove any new seedlings. This should be done when the plants are young and can be hand-pulled. All aspects of management within the conservation area (including invasive alien plant control) will be controlled by the Conservation Management Plan. 	Full Compliance	<ul style="list-style-type: none"> No invasive Port Jackson Willows were observed on the estate. The Conservation Management Plan was provided to the auditor by the ECO. This plan is to be implemented on the estate.
C3.11 Employment opportunities and procurement of goods and services	<ul style="list-style-type: none"> Residents of Kraaifontein should receive preference in Employment during the operational phase of the project and local contractors should be favoured for the supply of goods and services. 	Not Assessed	No proof of employment was provided to the auditor.

C3.12 Minimise visual impact	<ul style="list-style-type: none"> The architects and landscape architect must Employ methods to blend the development into the surrounding environment. Architecture, building materials, paint schemes and landscaping should be used to this effect. 	Full Compliance	This appeared to have been implemented as far as possible.
C3.13 Environmental auditing	<ul style="list-style-type: none"> The HOA in conjunction with the landscape contractor and the estate manager must conduct an annual audit to assess the state of the estate in achieving the goals of waste minimisation, water and energy conservation and the efficient use of natural such as rain water harvesting and composting. The audit report must be tabled at the annual general meeting of all the residents in the estate. 	Not Applicable	No annual audit has been undertaken at this stage as construction has recently been concluded.

3.3 General Audit Findings

The auditor's findings are based on the observations made on site at the time of the final environmental audit as well as a review of the ECO reports for the duration of the construction phase. All findings were audited against the requirements stipulated within the EMPr and the EA.

The points below are noteworthy as it relates to compliance with construction and operational phase specific conditions of the EMPr. Issues have been noted in Table 5 as well as within the ECO reports which can be requested from Sillito Environmental Consulting upon request.

- Works on site commenced during August 2021 and concluded in April 2024.
- Method statements were provided to the ECO during February 2022.
- Environmental training was undertaken by the ECO during January 2022.
- Based on the ECO reports, it appeared as though the environmental commitments of the EMPr and EA were largely understood.
- Overall, there have been very few significant environmental non-compliances during the construction phase. The ECO has kept a record of all non-compliances with a corrective action record table available in the ECO reports.
 - It was noted that all 2023 non-compliances were removed from the corrective action record table within some of the 2024 ECO reports.
- There have been no impacts on the conservation area.
- It is evident that mitigation measures contained within the EMPr as well as the ECO's recommendations were sufficient and effective in preventing and/or limiting impacts that may have resulted from the construction phase.
- No EMPr amendments were deemed necessary by the ECO or the auditor, therefore no amendments requested.
- The ECO submitted a final ECO report which detailed the conclusion of the construction phase.
- The holder is to note all operational phase requirements and ensure that all requirements are adequately implemented at the appropriate times during the operational phase.

The points below are noteworthy as it relates to compliance with the EA issued on the 15th of July 2019. Issues have been noted within Table 4.

- Sillito Environmental Consulting was appointed as the ECO for the duration of the construction phase.
- All listed activities commences within five years of the date of the EA being issued.
- The conservation area was demarcated for the duration of the construction phase. The area remained adequately fenced during the operational phase.
- No pollution incidents were reported.
- No heritage resources were uncovered.

Non-compliances noted within this report include the following:

- Proof of submission of the final ECO report was provided by the ECO, however no proof of submission of the various audit reports were provided.
- Method statements for access routes and traffic control or hazardous substances were provided.
- Waste management non-compliances were noted within the ECO reports. These non-compliances included
 - No provisions for waste management
 - General waste not adequately disposed of
 - Empty cement bags not adequately disposed of
- No drip trays were observed during some ECO reports.
- The conservation was not adequately fenced off with permanent wire prior to construction commencing.
- Vegetation clearing took place prior to the method statements being provided and site boundaries being put into place.
- The conservation area had not been adequately demarcated prior to vegetation clearing

- No fire officer was noted by the ECO.
- No hazardous waste inventory was provided.
- A borehole pump was observed during the final environmental audit, however no water use license was provided to the auditor.
- No provisions for waste management were observed by the ECO in some of the ECO inspections.
 - Waste bins were not labelled.
 - Waste was not adequately disposed of in some of the ECO reports.
- Cement batching non-compliances were noted within the ECO reports
 - Cement batching took place on the ground
 - Cement spilled over the impermeable surface and into the bare ground
- No dust mitigation measures were in place during vegetation clearing
- No arrangements for non-working periods were noted and no temporary closure reports were provided by the ECO.
- The ECO reports have made no note of the following documents
 - A copy of the EMPr;
 - A copy of the EA;
 - Environmental Method Statements;
 - Non-conformance reports;
 - Minutes and attendance registers of all environmental meetings;
 - Monitoring results – environmental monitoring reports, register of audits, non-conformance reports;
 - Incident book- copies of notification of emergencies and incidents;
 - Dust suppression measures register; and
 - Written corrective action instructions
- Silt and vegetation offcuts were observed in the storm water silt traps
- Cigarette buds within a planter box observed during the final environmental audit.

It is also to be noted that upon the request for documentation from the ECO, the original EA was not submitted to the auditor. The ECO was able to submit the amended EA for the transfer of rights but not the original EA. As such, it was noted that the auditor sourced the EA through desktop research. In addition, it was noted that the ECO did not audit the EA requirements throughout the construction phase, however many requirements within the EA were compliant as these requirements were found within the EMPr.

It is noted that all non-compliances which were noted within the ECO reports during the construction phase were all closed out and noted within the ECO reports. As the construction phase has concluded, no recommendations are made by the auditor. In addition, the final ECO report noted that all non-compliances were corrected during the construction phase.

Following the final environmental audit, the auditor will:

- Submit this final environmental report to the DEA&DP, as per the requirements of the related conditions of approval.
- Within seven days of the date of submission of the external audit report to the licensing authorities, notify all registered interested and affected parties of the submission of the report, and make the report available to anyone on request and on a publicly accessible website.

The auditor recommends that the holder is to familiarise themselves with the operational phase requirements noted within the EMPr and ensure that they are implemented at the appropriate time.

Table 6: General Audit Finding Observed on Site
Photographic Record of Findings on Site

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Figure 3: Security guardhouse controlling estate access

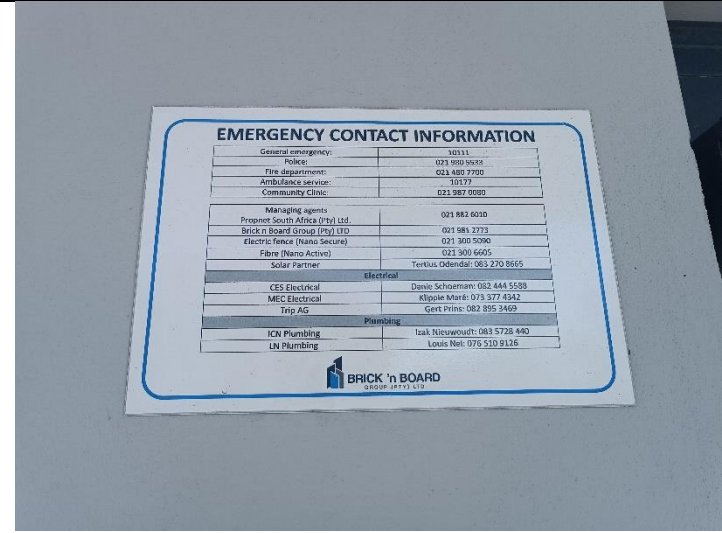


Figure 4: Emergency contact information displayed outside a refuse room



Figure 5: Landscaping which has been completed



Figure 6: Landscaping adjacent to public sidewalks

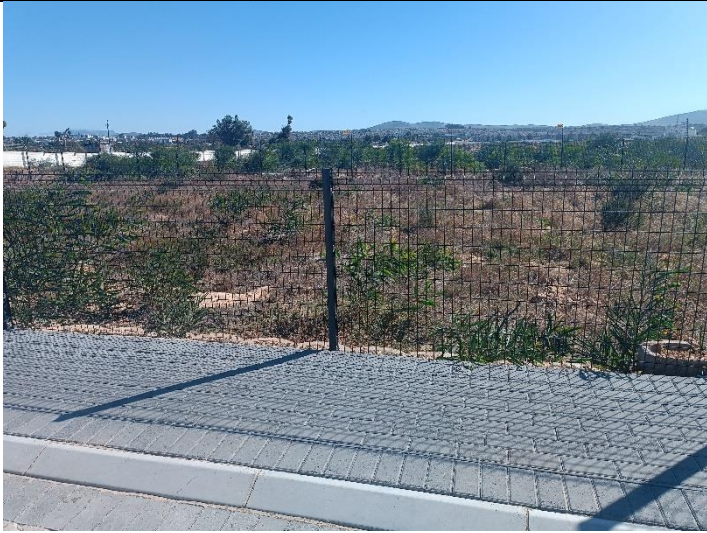


Figure 7: Fencing installed around the conservation area



Figure 8: Condition of the no-go area



Figure 9: Fencing around the stormwater attenuation pond and adjacent public park



Figure 10: Condition of the stormwater attenuation pond



Figure 11: Waste bins housed in a refuse room



Figure 12: Traffic signage observed close to the estate entrance

Photographic Record of Non-Compliances on Site During the Final Environmental Audit



Figure 13: Storm water drain blocked by silt and vegetation offcuts



Figure 14: Borehole pump with no water use license



Figure 15: Water tanks for the borehole pump



Figure 16: Cigarette buds within a planter box

4. CONCLUSION

4.1 Summary of Compliance

A high level of compliance was achieved during the final environmental audit. As mentioned in **Section 3.1** of this report, certain conditions would not be applicable at the time of the audit, while others may not have been assessed given that they may not have sufficient information available. The compliance levels achieved, according to the conditions within the EMPr and EA, is detailed in **Table 4** and **Table 5** above as well as **Figure 3 -Figure 16**.

Non-compliances are noted within **Table 4** and **Table 5** as well as **Section 3.3**. Non-compliances for the construction phase have been noted within the ECO reports and closed out. As the construction phase has concluded, minimal recommendations are made by the auditor. In order to remain compliant, the auditor recommends that the holder is to familiarise themselves with the operational phase requirements. It is recommended that the landowner seek a Water Use License for the use of the borehole. It is believed that the borehole would likely require authorization from the Department of Water and Sanitation for the use of the borehole water.

The audit process itself had no implications for the rights of any parties, and as such, no public consultation was deemed necessary for the successful completion of this task. Following the final environmental audit, the auditor will submit this final environmental report to the DEA&DP as well as notify all registered interested and affected parties of the submission of the report, and make the report available to anyone on request and on a publicly accessible website.