

THE CLEARANCE OF INDIGENOUS VEGETATION FOR CULTIVATION PURPOSES ON SECTIONS OF PORTION 38 OF THE FARM UITNOOD NO. 129, ROBERTSON.



REGULATION 34 AUDIT REPORT NO.1

Date:

3 December 2025

Prepared for:

Eilandia Plase (Pty) Ltd



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PROJECT DETAILS

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| PROJECT TITLE | The Clearance of Indigenous Vegetation for Cultivation Purposes on Sections of Portion 38 of the Farm Uitnood No. 129, Robertson. |
| DEA&DP REF: | 16/3/3/2/B1/14/1028/24 |
| APPLICANT | Eilandia Plase (Pty) Ltd |
| REPORT DATE | 3 December 2025 |
| DATE OF AUDIT SITE INSPECTION | 26 November 2025 |
| APPOINTED AUDITOR: | Lindsay Speirs Du Toit (trading as Earth Grace Environmental Consultancy) |
| EAPASA REGISTRATION NO | 2019/1470 |
| REPORT COMPILED BY: | Lindsay Speirs Du Toit (CV included as Appendix 6) |

1 INTRODUCTION

Eilandia Plase (Pty) Ltd was granted Environmental Authorisation (EA) on **12 February 2025** (reference no. 16/3/3/2/B1/14/1028/24) by the Department of Environmental Affairs and Development Planning (DEA&DP). Refer to **Appendix 1**.

In terms of Condition 14 of the EA, the holder of the EA must undertake an environmental audit once a year during the construction phase. The Environmental Audit Report must be prepared by an independent person and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended).

The final Environmental Audit Report must be submitted to the Competent Authority within six months after operation commenced.

The holder must, within seven (7) days of the submission of the Environmental Audit Reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the Environmental Audit Reports available to any I&APs on request and on a publicly accessible website (if applicable).

Lindsay Speirs du Toit, trading as Earth Grace Environmental Consultancy, has been appointed by Eilandia Plase (Pty) Ltd to conduct the required audit report to determine compliance with the conditions of the EA and the approved Environmental Management Programme (EMPr). This is the first audit report.

2 ENVIRONMENTAL AUDIT REPORT REQUIREMENTS

Appendix 7 of the NEMA EIA Regulations 2014, as amended, details the required contents of an Environmental Audit Report. The table below summarises these requirements and indicates where the information has been incorporated into this Environmental Audit Report.

| Content Requirement | Reference |
|--|---|
| (a) Details of– (i) The independent person who prepared the environmental audit report; (ii) The expertise of independent person that compiled the environmental audit report. | Refer to cover page and page 2 and the Auditor's CV attached as Appendix 6 . |
| (b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority. | Refer to Section 12. |
| (c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared. | See Section 3 |
| (d) A description of the methodology adopted in preparing the environmental audit report. | Refer to Section 5 |
| (e) An indication of the ability of the EMPr to – (i) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis; (ii) Ensure compliance with the provisions of environmental authorisation, and EMPr. | i. Section 8 . ii. Sections 6 and 7 |
| (f) A description of any assumptions made, and any uncertainties or gaps in knowledge. | Refer to Section 9 . |
| (g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report. | No consultation process was required. |

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| (h) A summary and copies of any comments that were received during any consultation process. | Not applicable. |
| (i) Any other information requested by the competent authority. | Not applicable. |

3 SCOPE AND PURPOSE OF THE REPORT

The scope of this environmental audit report is to audit the progress of the construction phase and to determine if the construction activities are compliant with the EA and EMPr.

The purpose of this Environmental Audit Report is to report the level of compliance with the conditions in the EA and EMPr and whether the objectives and outcomes of the EMPr are being achieved. Should any new impacts be identified, these will be reported on. The effectiveness and shortcomings of the EMPr will be evaluated and identified. The need for any amendments to the EMPr will be recommended in this Audit Report.

The Audit Report aims to comply with the requirements of Regulation 34 of the NEMA EIA regulations 2014, as amended.

4 APPROVED DEVELOPMENT AND LOCATION

The clearance of approximately 66ha of indigenous vegetation for cultivation on Portion 38 of Farm Uitnood No. 129, Robertson for the establishment of both irrigated and dryland crops. The site is divided into the following cultivation areas:

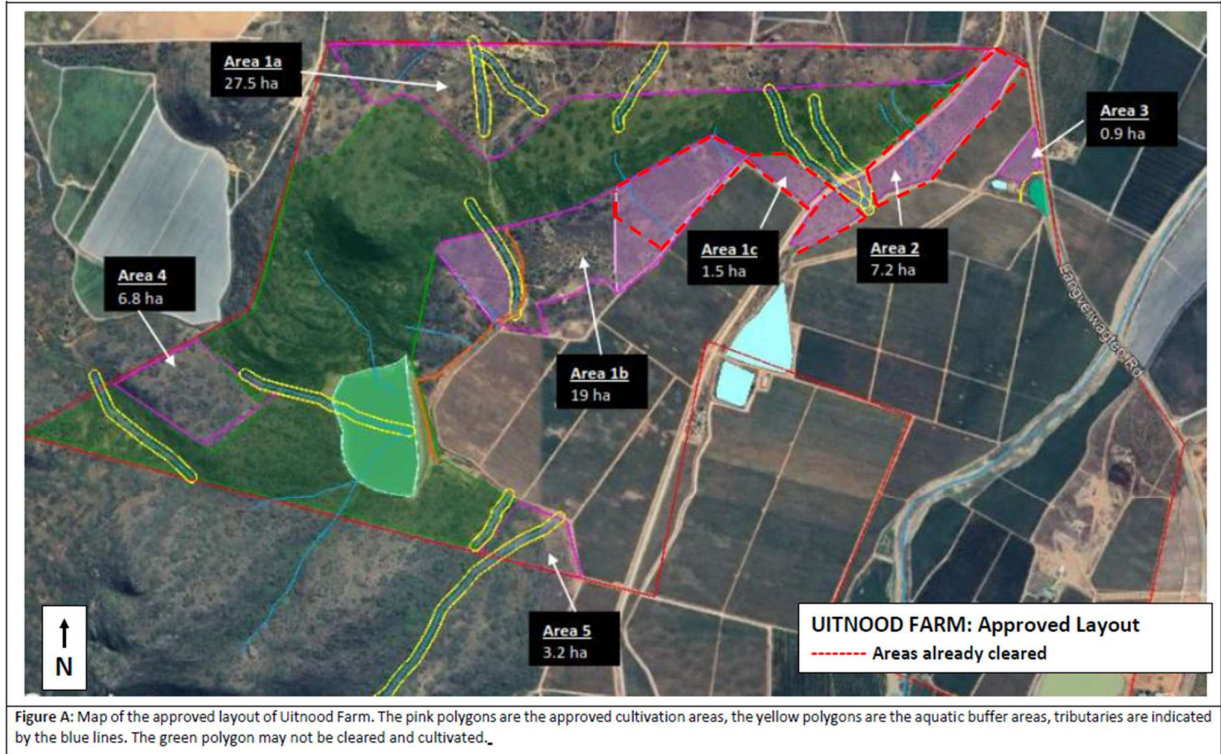
- Cultivation Area 1a that is 27.5ha in size,
- Cultivation Area 1b that is 19ha in size,
- Cultivation Area 1c that is 1.5ha in size,
- Cultivation Area 2 that is 7.2ha in size,
- Cultivation Area 3 that is 0.9ha in size,
- Cultivation Area 4 that is 6.8ha in size, and
- Cultivation Area 5 that is 3.2ha in size.

The listed activities will be undertaken on Portion 38 of Farm Uitnood No. 129, Robertson.

Activities Conducted to Date:

- Area 2 has been cleared and planted.
- Area 1c has been cleared and planted.
- A portion of area 1b has been cleared and planted.
- Area 3 has been demarcated for clearing.
- Wrongful clearing within an aquatic buffer area within Area 2.

Project Area



5 METHODOLOGY

Information was obtained from the following sources:

- Environmental Control Officer (ECO)
- Environmental Authorisation (EA)
- Holder of the EA
- Approved Environmental Management Programme (EMPr)
- ECO Monitoring Reports
- Commencement Notice

The Audit Report was compiled using the above-mentioned information and compliance was verified through a site inspection conducted on **26 November 2025**.

The tables in Section 6 and 7 of this report summarises the conditions of the EA and EMPr, rates the level of compliance with these conditions, addresses any items that require action and describes the Auditor's site inspection findings. The level of compliance with the conditions of the EA and EMPr, are rated using the following colour reference guide:

Red - indicates a serious non-compliance requiring immediate attention.

Yellow - indicates a less serious non-compliance that may require action.

Purple - indicates items that are noted.

Blue - indicates compliance.

6 COMPLIANCE WITH THE CONDITIONS OF THE ENVIRONMENTAL AUTHORISATION (EA)

| No. | Condition | Comment on Compliance | Compliant |
|-----|--|--|------------------------|
| 1 | The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Layout Alternative described in the EIA Report dated 10 October 2024. | Listed activities have commenced on site, as per the preferred layout. The EA is attached as Appendix 1 . | Compliant |
| 2 | The holder must commence with the listed activities on site within a period of 5 years from the date of issue of this Environmental Authorisation. | The EA was issued on 12 February 2025 . The Commencement Email (Appendix 2) dated 6 March 2025 notifies DEA&DP that construction activities would commence within 7 days of the date of the letter. Construction therefore commenced within the 5-year period mentioned in Condition 2. | Compliant |
| 3 | The development must be concluded within 10 years from the date of commencement of the first listed activity. | As mentioned above, commencement of the first listed activity was roughly 13 March 2025. The holder has until 13 March 2035 to complete the construction phase. | Compliant |
| 4 | The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder. | Noted. The Applicant holds all responsibility for the actions undertaken by anyone on site. | Noted. |
| 5 | Any changes to, or deviations from the scope of the alternative described in Section F above must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation. | <p>A Pre-Compliance Notice has been issued since the Holder of the EA deviated from the approved layout. This deviation was noted in the first ECO Monitoring Report.</p> <p>The ECO Monitoring Report notes that a section within Area 2 was wrongfully cleared within an aquatic buffer. This area measures ± 4800 m² in extent. The EA Holder agreed to rehabilitate this buffer area.</p> <p>Refer to Appendix 3 for a copy of the ECO Checklists.</p> <p>A Pre-Compliance Notice was issued on 17 November 2025 (reference no. 14/1/1/E2/1/6/3/0927/25) stating that a non-compliance with Condition 5 of the EA was noted. The Pre-Compliance Notice states: <i>If you inform the Department, in respect of paragraph 6 above that you intend to rectify the non-compliance, you must cease the above listed activity and confirm such within 7 (seven) calendar days, and you must provide the Department with a compliance audit report within 30 (thirty) calendar days of receipt of this Pre-Compliance Notice compiled by a suitably qualified and experienced independent environmental assessment practitioner. The said report must include the following:</i></p> <ul style="list-style-type: none"> • assessment and evaluation of the non-compliance of EA conditions; • identification of proposed remedial and/or mitigation measures; | Partial Non-Compliance |

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| | | <ul style="list-style-type: none"> an Action Plan to be approved by the Department, which must include adequate timeframes to comply with the aforesaid conditions. <p>Lindsay Speirs du Toit, trading as EarthGrace Environmental Consultancy, has been appointed to conduct the Compliance Audit as requested in the Pre-Compliance Notice. Refer to Appendix 7 for a copy of the Compliance Audit.</p> <p>The Compliance Audit includes a Rehabilitation Plan as well as an Action Plan prescribing timeframes for the required measures.</p> <p>This non-compliance has been given a partial compliance rating since it is the opinion of the Auditor that from what could be seen on site during the Audit Site Inspection, the wrongful clearing did not have a significant impact on any watercourses and the proposed rehabilitation will sufficiently return the area to a near- original state.</p> | |
| 6 | <p>Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities. The notice must:</p> <p>6.1 make clear reference to the site details and EIA Reference number given above; and</p> <p>6.2 include proof of compliance with the following conditions described herein: Conditions: 7, 8 and 11.</p> | <p>The competent authority was informed in writing on 6 March 2025, by the appointed ECO, that activities will commence on site within 7 days.</p> <p>The notice complies with the requirements of this condition and proof of compliance with Conditions 7, 8 and 11 was included. Refer to Appendix 2 for a copy of the Commencement Email.</p> | Compliant |
| 7 | <p>The holder must in writing, within fourteen (14) calendar days of the date of this decision–</p> <p>7.1. Notify all registered Interested and Affected Parties (“I&APs”) of – 7.1.1. The outcome of the application; 7.1.2. The reasons for the decision as included in Annexure 3; 7.1.3. The date of the decision; and 7.1.4. The date when the decision was issued.</p> <p>7.2. Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the <i>National Appeals Regulations, 2014</i> detailed in Section I below.</p> <p>7.3. Draw the attention of all registered I&APs to the manner in which they may access the decision.</p> <p>7.4. provide the registered I&APs with:</p> <p>7.4.1. The name of the holder (entity) of this Environmental Authorisation; 7.4.2. The name of the responsible person for this Environmental Authorisation; 7.4.3. The postal address of the holder; 7.4.4. The telephonic and fax details of the holder; 7.4.5. The e-mail address, if any, of the holder; and 7.4.6. The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the <i>National Appeal Regulations, 2014</i>.</p> | <p>The EA was issued on 12 February 2025, and the I&AP’s were notified on the same day. The notification was sent within the specified timeframes, the content of the letter was compliant with Condition 7 and all registered I&APs were notified. Refer to the proof of notification included as Appendix 4.</p> | Compliant |
| 8 | <p>The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notifies the registered I&APs of this decision. In the event that an appeal is lodged with the</p> | <p>The EA was issued on 12 February 2025, and the 20 day appeal period ended on 4 March 2025. Construction commenced after the 20 days provided for notice</p> | Compliant |

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| | Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided. | of appeal submissions. It was confirmed with the Department that no appeals were received. | |
| 9 | The draft Environmental Management Programme (“EMPr”) submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented. | The EMPr is being implemented by the Holder of the EA and ECO. The EMPr is included as Appendix 5 . | Compliant |
| 10 | The EMPr must be included in all contract documentation for all phases of implementation. | It is the Auditor’s understanding that there is no formal contract with contractors working on site. The ECO has confirmed that the holder of EA has been instructed to comply with the conditions of the EA and management outcomes of the EMPr and all clearing activities must comply with the EA and EMPr. | Compliant |
| 11 | The holder must appoint a suitably experienced environmental control officer (“ECO”), or site agent where appropriate, before commencement of any land clearing or development activities to ensure compliance with the provisions of the EMPr and the conditions contained herein. The ECO must conduct monthly site visits and must submit ECO reports on a quarterly basis to the competent authority. | Cornerstone Environmental Consultants (Pty) Ltd have been appointed to conduct ECO monitoring services for the duration of the active construction phase. The ECO Checklists are included as Appendix 3 . | Compliant |
| 12 | A copy of the Environmental Authorisation, EMPr, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request, including a publicly accessible website. | According to the ECO, copies of the documents are at the office. | Compliant |
| 13 | Access to the site referred to in Section C above must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein. | No issues relating to accessing the site were experienced during the audit site inspection. | Compliant |
| 14 | In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr. The Environmental Audit Report must be prepared by an independent person (other than the appointed Environmental Assessment Practitioner or Environmental Control Officer) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014. The holder must undertake environmental audits and submit an Environmental Audit Report to the Competent Authority once a year during the construction phase. A final Environmental Audit Report must be submitted to the Competent Authority within six months after the development activities have been completed. The holder must, within 7 days of the submission of each of the above-mentioned reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable). | Lindsay Speirs du Toit (trading as EarthGrace Environmental Consultancy) was appointed on 21 November 2025 to conduct the required Audits in terms of Regulation 34. Lindsay Speirs du Toit was not the EAP or ECO involved in this application and is therefore considered independent. The first Audit Site Inspection on 26 November 2025. This first Audit Report contains all information as prescribed in Appendix 7 of the EIA Regulations 2014, as amended. Registered I&APs will be notified of the Audit Report and it will be uploaded on the Auditor’s website for review. Since construction activities commenced mid March 2025, an Audit Report is due prior to March 2026. This Regulation 34 Audit is therefore within the prescribed timeframe. | Compliant |
| 15 | Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western | No heritage remains have been reported by the ECO. The auditor did not observe any heritage or archaeological finds during the site inspection. | Compliant |

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| | <p>Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.</p> <p>Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.</p> | | |
| 16 | A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority. | Noted. No remains or resources have been discovered. | Not Auditable |
| 17 | No agricultural shade netting may be erected in the areas approved for cultivation in this Environmental Authorisation. | No shade netting was noted within the areas cleared as per the approved layout. | Compliant |

7 COMPLIANCE WITH THE CONDITIONS OF THE EMPr

| Description of Management Action | Comments on Compliance | Compliance |
|---|--|---------------|
| Job Creation | | |
| The criteria for and selection of labourers for the project should demonstrate preference for the local communities. Such requirements should be included in contract documents, if applicable. | It is the Auditor's understanding that farm workers and local contractors assisted with construction activities. | Compliant |
| Residents from the surrounding communities should be employed where unskilled labour is required, during the construction phase as and where possible. | It is the Auditor's understanding that farm workers and local contractors assisted with construction activities. | Compliant |
| Fire Prevention and Emergencies | | |
| Construction personnel shall be made aware of the health risks associated with any hazardous substances used (e.g., smoking near refuelling depots) and shall be provided with appropriate protective clothing / equipment in case of spillages or accidents. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |
| The outbreak of an uncontrolled fire shall be reported to the farm manager / contractor after immediately taking the necessary steps to control and extinguish the fire. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |
| Smoking shall be prohibited in the vicinity of flammable substances and may only take place at designated smoking areas, and cigarette butts must be disposed of in lidded bins. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |
| Open fires for heating and cooking should not be permitted on site. | No fires were observed. | Not Auditable |
| The contractor shall ensure that fire-fighting equipment is available on site, in particular where flammable substances are being stored or used. Ensure that a working fire extinguisher is immediately at hand if any "HOT WORK" is undertaken e.g. welding, grinding, gas cutting etc. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |
| Any welding or other sources of heating of materials shall be done in a controlled environment and under appropriate supervision, in such a manner as to minimise the risk of fires and/or injury to staff. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |

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| Ensure that all personnel are aware of emergency reporting procedures and their responsibilities. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |
| Any emergency incident, originating at the proposed facility, which falls within the definition of section 30 (l) (a) of the NEMA must be dealt with by the facility in accordance with section 30 of the NEMA. In the event of any incident, the facility must ensure containment of the spill or hazard, by the responsible person, and notify the Pollution Information and Chemicals Management Section of the Department at 021 483 2760 / 4099 immediately after the situation is under control. | No active construction activities were underway during the Audit Site Inspection. | Not Auditable |
| Site Layout Plan Compliance | | |
| The final detailed design and layout plan must adhere to the conceptual layout assessed in the EIA process, and with the conditions of the Environmental Authorisation. | The layout plan has been adhered to, to date. There is a small deviation of the plan - a section within Area 2 was wrongfully cleared within an aquatic buffer. This area measures ± 4800 m ² in extent. The EA Holder agreed to rehabilitate this buffer area. This deviation is being dealt with separately, in terms of the requirements in the Pre-Compliance Notice. Refer to Appendix 7 for a copy of the Compliance Audit as requested by the Pre-Compliance Notice. | Partial Non-Compliance |
| If the final detailed layout plan varies significantly from the one evaluated in the EIA Report, an Environmental Consultant must assess the revised layout. Subsequently, the Competent Authority should amend the Environmental Authorisation before commencement of any activities. | The deviation from the plan is being rehabilitated. | Compliant |
| Climate Change Vulnerability and Adaptation | | |
| Best cultivar and forage crop selection to best resist climate challenges. | Best farming practises will be and are being implemented. | Compliant |
| Effective stormwater runoff design to manage potential flooding and prevent erosion due to excessive stormwater flow. | Stormwater management measures are in place. Stormwater overpasses were constructed over the irrigation canal as per the instructions in the Stormwater Management Plan, to prevent damage to the canal during times of heavy rains Refer to the photographs in Section 10 of the report. | Compliant |
| Effective irrigation management and availability. | Best farming practises will be and are being implemented. | Compliant |
| Fire prevention control measures in place. | Best farming practises will be and are being implemented. | Compliant |
| Site Demarcation | | |
| Cultivation areas must be clearly demarcated before vegetation clearance takes place. | Area 2 was not demarcated prior to commencement of clearing activities; however, Areas 1b, 1c and 3 were demarcated with iron pens. A portion of Area 1b has been cleared and the entire Area 1c has been cleared. The Auditor noted the demarcation pegs in Area 3. | Compliant |
| No-go areas and buffer areas along the relevant watercourses must be clearly demarcated prior to the commencement of any vegetation clearing and construction activities. A buffer area of 15 m must be implemented for the significant drainage lines. | The watercourse and buffer area within Area 2 was not demarcated. Demarcation of no-go areas will be done prior to future clearing activities. | Partial Non-Compliance |
| A 20 m buffer for the wetland area at Cultivation Area 3 must be implemented. | The wetland and buffer adjacent to Area 3 was demarcated. | Compliant |
| The contractor's camp (if relevant) must be located as far away from the no-go areas as possible. | No contractor's camp was noted on the site. | Compliant |
| Contractor's Camp and Facilities | | |
| The locality of the camp must be in an area which will have the least disturbance to the surrounding environment, and outside of aquatic features. | No contractor's camp will be required for the clearing activities. | Not auditable |
| Adequate signage must be displayed to designate the site office / camp as a restricted area to non-personnel. | No contractor's camp will be required for the clearing activities. | Not auditable |

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| Bins for the temporary storage of construction related waste must be provided inside the site camp. | No contractor's camp will be required for the clearing activities. | Not auditable |
| One chemical toilet for every 15 male workers and 2 chemical toilets for every 10 female workers must be provided. All construction workers will be required to use the chemical toilet(s). | No contractor's camp will be required for the clearing activities. | Not auditable |
| All temporary/portable toilets should be secured to the ground to the satisfaction of the ECO to prevent them from toppling due to wind or any other cause. | No contractor's camp will be required for the clearing activities. | Not auditable |
| The chemical toilets shall be properly maintained and cleaned on a regular basis (at least once a week). Sewage from the chemical toilets must be disposed of at a suitably licensed sewage disposal facility. | No contractor's camp will be required for the clearing activities. | Not auditable |
| Water for drinking purposes shall be obtained from a sustainable source. | No contractor's camp will be required for the clearing activities. | Not auditable |
| Burying of any materials on site shall not be allowed. | No contractor's camp will be required for the clearing activities. | Not auditable |
| The site camp and related site camp facilities must be kept neat and orderly at all times, in order to prevent potential safety risks and to reduce the visual impact of the site during construction. | No contractor's camp will be required for the clearing activities. | Not auditable |
| Any temporary storage areas for potentially contaminating materials shall be roofed with impervious material. The ingress of wind-blown rain should be avoided by sufficient roof overhang or sides of sufficient height. | No storage areas were noted on site. | Not auditable |
| Stormwater shall be diverted around any temporary storage area(s). | No storage areas were noted on site. | Not auditable |
| Hazard signs indicating the nature of stored materials should be displayed on the temporary storage facility or container, if such a facility is provided. | No contractor's camp will be required for the clearing activities. | Not auditable |
| Any fuel storage facilities (including any tanks) should be surrounded by a bund wall, to ensure that accidental spillage does not pollute local soil or water resources. Materials are to be stored on drip trays. | No fuel was noted on site during the Audit Site Inspection. | Not auditable |
| The Contractor should indicate the emergency procedures in the event of misuse or spillage that may negatively affect an individual or the environment in a Method Statement. | No contractor's camp will be required for the clearing activities. | Not auditable |
| An inventory of any hazardous chemicals/substances (including that within equipment), along with a description of possible ill effects and treatment of health-related afflictions resulting from accidents, should be kept in the storage area as well as by the appropriate manager. Such documents are known as Material Safety Data Sheets. | No hazardous chemicals were noted during the Audit Site Inspection. | Not auditable |
| Environmental Awareness Plan | | |
| Present Environmental Awareness Plan and induct personnel on Environmental Matters during "toolbox" talks. | No contractors have been appointed to date. However, it is important that farm worker's conducting clearing activities understand the relevant environmental matters relating to the area they are clearing. | Not auditable |
| This EMP must form part of the contractual agreements with the specific contractors. | No contract work. | Not auditable |
| Keep proof of attendance on file. | No contractors have been appointed to date – no register in place. | Not auditable |
| Site Access and Traffic Management | | |
| Access to the farm sites must be limited to existing roads only, and no new access roads may be established. | No new access roads were noted to areas cleared and cultivated. | Compliant |

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| The Contractor (where applicable) shall strictly control the movement of all construction vehicles and plant including that of his suppliers so that they remain on designated routes and are distributed so as not to cause a traffic hinderance. | No contractor on site. | Not auditable |
| Usage of public roads shall be restricted to normal working hours. | The Holder of the EA has noted this. | Noted. |
| Appropriate traffic warning signs shall be maintained where needed. | The Holder of the EA has noted this. | Noted. |
| Sand and other construction materials that are accidentally deposited on public roads must be cleared up immediately. | No sand or material were noted on the public roads. | Compliant |
| Strictly enforce speed limits on construction vehicles and other heavy vehicles. | No construction vehicles were noted during the Audit Site Inspection since no clearing activities were in progress. | Not auditable |
| Construction Activities within/close to Aquatic Features | | |
| Establish the no-go aquatic buffer zone as explained under paragraph 9.3.1 of this EMPr. | The no-go area within Area 2 was not established but is being rehabilitated. The wetland and buffer area adjacent to Area 3 has been demarcated. It appears that a herbicide was sprayed over this wetland area since there was a blue tinge to the vegetation. The Holder of EA has stated that the roads authorities sprayed the herbicide along the roads and it drifted onto his land. | Compliant |
| Construction workers and vehicles must be prevented from entering the watercourses. | No workers or vehicles were observed within watercourses. | Compliant |
| Construction activities should take place during the dryer months, if possible. | No construction activities were in progress during the Audit Site Inspection. | Not auditable |
| No waste or foreign material may be dumped into any water features. | No waste was noted within watercourses. | Compliant |
| Tools, clothing or other materials may not be cleaned in the streams. | No construction activities were in progress during the Audit Site Inspection. | Not auditable |
| Rocks and vegetation debris should not be dumped onto natural vegetation or within any watercourses. (Not to be confused with the erosion ditches that need to be rehabilitated.) | No rock or vegetation debris was noted within natural areas or watercourses. | Compliant |
| No stockpiles are to be located within 50 metres of a watercourse and erosion control measures may be required around stockpiles. | No stockpiles were observed by the Auditor. | Compliant |
| Effective sediment traps should be installed where necessary to prevent runoff from the construction or development areas into the watercourse, where necessary. | No construction activities were in progress during the Audit Site Inspection. | Not auditable |
| Mixing of mortar and concrete (if relevant) should take place on an impermeable substratum such as shutter ply, not plastic sheeting that can tear. | No concrete mixing was noted on site. | Not auditable |
| Cement effluent will not be allowed to flow into the natural environment. Alternatively, a large plastic container should be used to contain cement residues and the contents, when dry, can be disposed of at a landfill site. | No cement mixing was noted on site during the Audit Site Inspection. No cement spillage was observed. | Not auditable |
| All Construction Activities close to Areas containing Indigenous Vegetation | | |
| Natural connectivity should be maintained between the steep hills, vegetation patches containing significant colonies of plant SoCC, as well as pristine natural Breede Sand Fynbos areas on the farm. | The Botanical No-Go Area has not been affected by the activities to date. | Compliant |
| Rocks and vegetation debris should not be dumped onto natural vegetation outside of the proposed development footprint areas or within any watercourses. | No rocks or debris was noted within natural areas. | Compliant |
| Areas compacted by vehicles during construction shall be scarified or ripped, if necessary, to allow penetration of plant roots and the re-growth of vegetation if outside the boundaries of the site footprint. | No compacted areas were noted. | Compliant |

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| All personnel and vehicles used for transportation and/or construction purposes should remain within the demarcated routes and areas, i.e., vehicles should not be allowed to drive randomly across the property but should remain within the approved routes. | No vehicles off existing roads were observed during the Audit Site Inspection. | Compliant |
| Hydrocarbon Management | | |
| All vehicles, equipment, fuel and petroleum services must be maintained in a good condition to prevent leakages and potential contamination of soil. | No faulty vehicles or equipment were noted on site. | Compliant |
| Runoff from fuel depots/bousers, workshops and truck washing areas shall be routed through an oil trap equipped with oil recovery equipment. The remaining water will be discharged, through a sediment trap. | No washing of vehicles was observed during the Audit Site Inspection. | Compliant |
| All hydrocarbon spills are to be addressed immediately to prevent seeping into the ground. | According to the ECO Monitoring Reports, no spills have been reported. | Compliant |
| Any emergency servicing of construction machinery is to be done over drip trays. In addition, fuel-driven generators are to be placed on drip trays. | No servicing of vehicles were noted on site. | Compliant |
| Drip trays shall be inspected and emptied daily. In particular drip trays shall be closely monitored during rain events to ensure that they do not overflow. Drip trays shall be leak-free. | No stationery vehicles or equipment was noted on site. | Compliant |
| The Farm Manager / Contractor shall maintain a used oil storage container into which used oils must be poured, with a funnel, and disposed of at a used oil company. | | Not auditable |
| Waste management | | |
| It is advisable to implement an on-site integrated waste management system, grounded in the principles of waste minimisation. This system should encompass practices of reduction, recycling, re-use, and appropriate disposal as necessary. Therefore, separate waste bins/skips that are weather and animal proof must be provided for recyclable waste, general waste and hazardous waste. | No waste bins were noted. However, proposed activities are clearing activities which will generate little waste, other than green waste. No building rubble or other waste was noted. | Compliant |
| Any temporary storage areas for potentially contaminating materials shall be roofed with impervious material. The ingress of wind-blown rain should be avoided by sufficient roof overhang or sides of sufficient height. | No contaminated materials were observed. No spills or leaks were noted on site. | Compliant |
| No littering shall be allowed. | No litter was observed during the Audit Site Inspection. | Compliant |
| Burying or burning of any materials on site shall not be allowed. | The Holder of the EA has noted this. | Noted. |
| Used oil, lubricants and cleaning materials from the maintenance of vehicles and machinery shall be collected in a holding tank and returned to the supplier. Alternatively, oils collected in this manner shall be retained in a safe holding tank and removed from site by a specialist oil recycling company for disposal at an approved hazardous waste disposal site, e.g. Oilkol or The R.O.S.E Foundation. | The Holder of the EA has noted this. | Noted. |
| Other hazardous waste shall be disposed of at a licensed hazardous landfill, or through a registered hazardous waste management company. | The Holder of the EA has noted this. | Noted. |
| Green waste may be stockpiled on the ground, or in separate skips until removal, or until it is burnt on site. If the bins/skips are to be emptied, the waste must be taken to a registered recycling / waste facility. | No green waste was noted during the Audit Site Inspection since no clearing activities were occurring at the time of the site inspection. | Not Auditable |
| Non-recyclable and non-reusable waste (e.g. builder's rubble, etc.) generated on site must be disposed of at a landfill site licensed in terms of the applicable legislation. | This is noted by the Holder of the EA. | Noted. |
| Stormwater Management and Erosion Control | | |

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| Effective measures should be implemented to prevent/manage soil erosion at watercourse crossings and along steep hills. | The Stormwater Management Plan is being implemented on site. | Compliant |
| The Stormwater Management Plan (Addendum F) must be implemented. | The Stormwater Management Plan is being implemented on site. | Compliant |
| The Le Chasseur & Goree Irrigation Canal that crosses Uitnood Farm must be protected from soil runoff and erosion damage. Stormwater runoff overpass chutes must be constructed at intervals of ± 200 m along the southern edge of Cultivation Area 2. Contours furrows must be constructed to direct runoff to these furrow points. These should be sufficient to accommodate a major storm event. | These overpass chutes have been constructed at the required locations. | Compliant |
| Stockpiles of topsoil and spoil material must be protected from wind and water erosion (e.g. it must be covered, or erosion channels around them, or compacted, etc.). | The Stormwater Management Plan is being implemented on site. | Compliant |
| Climate Change Mitigation | | |
| Optimise the loading and routing of trucks and other vehicles and adjust truck engines to ensure optimal energy/diesel efficiency. | No trucks were observed on site. | Not Auditable |
| Prioritise technology alternatives that optimise energy saving where possible for the construction phase of the development. | No construction activities were underway at the time of the Audit Site Inspection. | Not Auditable |
| Climate Change Adaptation | | |
| Any temporary plant material stockpiled on site should be placed as far as possible away from the surrounding natural areas and should be limited in size as and where possible, to reduce the potential fire risk. | This is noted by the Holder of the EA. | Noted. |
| During site preparation, the Applicant should remove and mulch the large shrubs and plough it into the soil together with the smaller shrubs and grass. This will assist in protecting the soil from wind and water erosion, reduces moisture loss, and adds organic matter to the soil. | This is noted by the Holder of the EA. | Noted. |
| Effective and precision water management during vineyard establishment must be implemented to contribute towards its survival during warm and dry periods. Farming practices should focus on conserving soil moisture, for example, maintaining a continuous organic soil cover. | This is noted by the Holder of the EA. | Noted. |
| Monitor soil moisture accurately and adjust irrigation regime to prevent over irrigation. | This is noted by the Holder of the EA. | Noted. |
| Improvements in monitoring and flood early- warning systems are required as well as access to support for disaster relief following a flooding event. | This is noted by the Holder of the EA. | Noted. |
| Erosion and stormwater runoff management and control measures must be implemented where necessary, especially on steeper areas. The Stormwater Management Plan (Addendum F) must be implemented. | The approved Stormwater Management Plan is being implemented on site. | Compliant |
| Effective fire prevention and management measures must be followed (refer to paragraph 9.1.2 above). | This is noted by the Holder of the EA. | Noted. |
| Dust Management. | | |
| If any areas are cleared or disturbed, these areas should be kept wet with water or soil-binders if necessary to reduce dust. The use of straw worked into the sandy areas may also help and the ECO must advise when this is necessary. | No dust was observed during the Audit Site Inspection. The ground is very sandy which means dust will be limited during clearing activities. | Compliant |
| Avoid engaging in clearance, handling activities, or transporting erodible materials during the hottest, driest, and windiest months of the year. | This is noted by the Holder of the EA. | Noted. |

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| The removal of covering vegetation shall be avoided until such time as soil stripping is required and similarly exposed surfaces should be stabilised as soon as is practically possible. | This is noted by the Holder of the EA. | Noted. |
| Cleared areas should be provided with a suitable cover as soon as possible, and not left exposed for extended periods of time. | All cleared areas have been planted to ensure soils are covered. | Compliant |
| The location of stockpiles must take into account the prevailing wind direction and should be situated so as to have the least possible dust impact to surrounding residents, road-users and other land-users. | This is noted by the Holder of the EA. No stockpiles were observed by the Auditor. | Compliant |
| Speed limits must be enforced in all areas, including public roads and private property to limit the levels of dust pollution. The speed limit should be set at 20-40 km/h. | This is noted by the Holder of the EA. | Noted. |
| Faunal Management | | |
| Any animals encountered during the construction activities should be left unharmed and if necessary, relocated or just allowed to move to adjacent natural areas (e.g., tortoises, snakes, mice, lizards, etc.). | This is noted by the Holder of the EA. | Noted. |
| Competent snake handlers must be contacted to move snakes, when necessary. | This is noted by the Holder of the EA. | Noted. |
| All construction vehicles should adhere to a low-speed limit (40 km/h for cars and 30 km/h for trucks) to avoid collisions with susceptible species such as snakes and tortoises and rabbits or hares. | No speeding vehicles were noted on site. | Compliant |
| All personnel must undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes, tortoises and owls, which are often persecuted out of superstition. | The ECO Monitoring Reports state that no personnel were appointed but it is advisable that farm worker's undertaking the clearing activities should receive environmental induction. | Not Auditable |
| Site screening for nests must be conducted before construction commences. Special attention must be given to two specific bird species, namely <i>Circus maurus</i> (black harriers) and <i>Neotis denhami</i> (Denham's bustard). | This is noted by the Holder of the EA. It is recommended that the ECO screen the area identified for clearing prior to commencement of clearing activities. | Noted. |
| All open trenches on site must be covered or enclosed to prevent trapping animals. | No open trenches were observed on site. | Compliant |
| Heritage Resources | | |
| Should any archaeological deposits or remains be uncovered during activities on site, work must stop immediately, and Heritage Western Cape (HWC) be informed. | No archaeological remains or deposits have been identified to date. | Compliant |
| The HWC Fossil Chance Find Protocol (Addendum E) must be implemented for any excavation activities taking place on the application area. | This is noted by the Holder of the EA. | Noted. |
| If any unmarked graves, buried archaeological material or fossil material are uncovered or exposed during bulk earthworks, these must immediately be reported to HWC (Tel: 021 483 9685). | No graves have been identified to date. | Compliant |

8 EFFECTIVENESS OF THE EMPR

It is the Auditor's opinion that the EMPr has adequately addressed and provided for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the construction activities to date. The conditions of the EA and outcomes of the EMPr are sufficiently achieved.

No additional impacts were identified through the auditing process other than those relating to the unlawful clearing of the no-go area within Area 2. The unlawful cleared area is being rehabilitated and the Auditor is not concerned about this aspect.

There are no shortcomings in the EMPr.

9 ASSUMPTION, UNCERTAINTIES/ GAPS IN KNOWLEDGE

It is assumed that all information provided by the ECO, is correct and complete.

It is uncertain when construction activities will commence again.

There are no significant gaps in knowledge.

10 PHOTOGRAPHIC RECORD



Red arrow indicating approved portion of Area 2 (northeast) which has been cleared and planted. Blue arrow indicates area of deviation that has been rehabilitated. Area adjacent to the identified watercourse/no-go area consists of a farm road, cutoff drain, fence and main gravel road.



Red arrow indicating approved portion of Area 2 (southwest) which has been cleared and planted. Blue arrow indicates area of deviation that has been rehabilitated.



Area being rehabilitated.



Indigenous species are established and doing well. Cosmos daisies have been planted in between indigenous species.



Botterboom has taken and is doing well.



The inner triangle between the no-go areas.

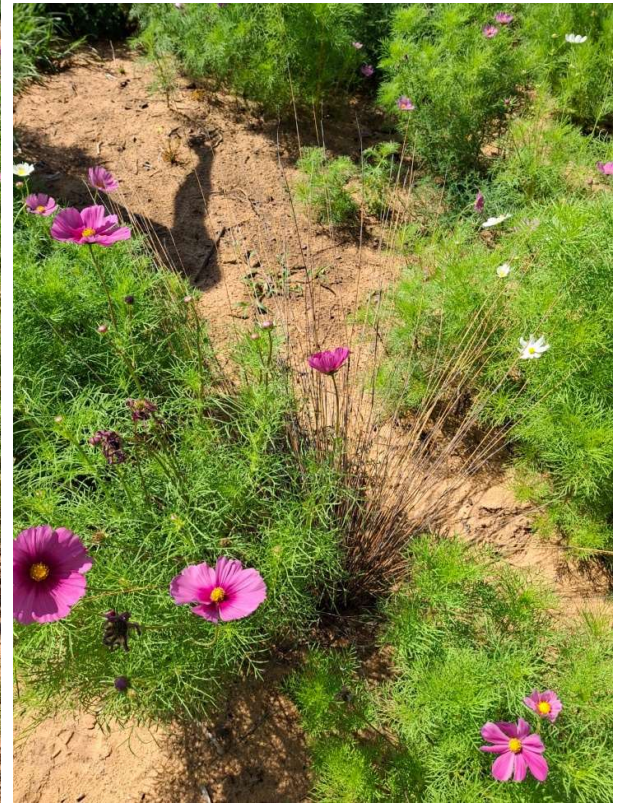
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Irrigation pipes used to irrigate rehabilitated area.



Indigenous reeds have been planted. Note sandy soils.



Reeds are doing well.



Rehabilitated area.



Stormwater Management – Stormwater overpasses have been constructed to protect the irrigation canal.



The Irrigation canal.

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View of the rehabilitated area from the stormwater overpass with Area 2 on either side.



Cleared and planted portion of Area 2, southwestern portion.



Area 2, northeastern portion.



Area 1c on the left of the road and Area 2 to the right of the road.



A portion of Area 1b has been cleared and planted with a crop to cover the soil – see area behind vineyards.



Area 1c has been planted with a crop to prevent soil from being exposed.

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Area 1c and 1b.



View of the Aquatic No-Go Area adjacent to Area 3. Area 3 has not been cleared yet.



The No-Go Area (wetland and buffer) has been demarcated with iron pegs. The arrow indicates Area 3



Wetland area with buffer.



View of the wetland area and associated buffer.



Date of Audit Site Inspection 26 November 2025.

Wednesday, 26 November 2025 · 09:08 [Edit](#)

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11 CONCLUSION

The activities on site were found to be generally compliant with all major conditions and management outcomes as set out in the EA and EMPr.

The area wrongfully cleared within Area 2 has been rehabilitated and must be monitored as per the Rehabilitation Plan and Action Plan included in the attached Compliance Audit (**Appendix 7**).

The ECO must be informed prior to the commencement of future clearing activities. It is recommended that the ECO screen cultivation areas for nests, as required by the EMPr, prior to commencement of clearing activities. It is also recommended that the farm workers involved in clearing activities receive environmental induction.

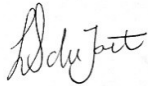
12 DECLARATION

Declaration of the Auditor:

I, **Lindsay Speirs du Toit**, as an independent Environmental Assessment Practitioner, hereby declare/affirm the correctness of the information provided or to be provided as part of the environmental audit report, and that I:

- act/ed as the independent Environmental Auditor.
- in terms of the general requirement to be independent, other than fair remuneration for work performed/to be performed in terms of this audit report, have no business, financial, personal, or other interest in the activity or application and that there are no circumstances that may compromise my objectivity.
- in terms of the remainder of the general requirements for an environmental auditor, am fully aware of and meet all the requirements and that failure to comply with any the requirements may result in disqualification.
- have and will not have any interest in the proposed activity.
- undertake the environmental audit based on information provided to me by the Holder of the Environmental Authorisation, and additional information obtained during the audit period.
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of the EAP:



Name of Company:

Trading as Earth Grace Environmental Consultancy

3 December 2025
