

# UPGRADE OF DIVISIONAL ROAD DR1400 FROM KM 8.2 TO KM 10.21, NUY STATION, WORCESTER.



Date:

**15 April 2026**

Prepared for:

**Western Cape Government: Department of Transport and Public Works**



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**REGULATION 34 AUDIT REPORT NO.2**

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## PROJECT DETAILS

PROJECT TITLE	<b>Upgrade Of Divisional Road DR1400 from Km 8.2 To Km 10.21, Nuy Station, Worcester</b>
DEA&DP EIA REF:	<b>16/3/3/1/B2/32/1010/22</b>
APPLICANT	<b>Western Cape Government: Department of Transport and Public Works</b>
REPORT DATE	<b>15 April 2026</b>
DATE OF AUDIT SITE INSPECTION	<b>10 April 2026</b>
APPOINTED AUDITOR:	<b>Lindsay Speirs Du Toit (trading as Earth Grace Environmental Consultancy)</b>
EAPASA REGISTRATION NO	<b>2019/1470</b>
REPORT COMPILED BY:	<b>Lindsay Speirs Du Toit (CV included as Appendix 6)</b>

## 1 INTRODUCTION

The Western Cape Government: Department of Transport and Public Works was granted authorisation, on 12 September 2022, by the Department of Environmental Affairs and Development Planning (DEA&DP), for the upgrade of the Divisional Road DR1400 between km 8.2 to km 10.21, Nuy Station, Worcester. The Environmental Authorisation (EA) dated 12 September 2022 with DEA&DP EIA reference number 16/3/3/1/B2/32/1010/22 is attached as **Appendix 1**.

In terms of Condition 14 of the EA, the holder of the EA must conduct environmental audits and submit an Environmental Audit Report to the Competent Authority once every 6months for the duration of the construction activities. A final Environmental Audit Report must be submitted within three months after the development is completed. The Audits must be conducted in terms of Regulation 34 of the NEMA EIA Regulations 2014, as amended. Lindsay Speirs, trading as Earth Grace Environmental Consultancy, has been appointed to conduct the required audits and to determine compliance with the conditions of the EA and the approved Environmental Management Programme (EMPr).

## 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; and (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 <b>Appendix 6</b> .
(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 <b>Section 3</b>
(d) A description of the methodology adopted in preparing the environmental audit report.	Refer to <b>Section 5</b>
(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 on-going basis; (ii) Ensure compliance with the provisions of environmental authorisation, and EMPr.	i. <b>Section 8.</b> ii. <b>Sections 6 and 7</b>
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Refer to <b>Section 9</b> .
(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.
(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 assessed and 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 proposed development will include following:

- ✓ The upgrade of the gravel road to a surfaced road;
- ✓ The replacement of existing culverts and the development of new culverts; and
- ✓ The widening of the road at km 8.230 to km 8.400 by 7.1m and at km 8.400 to km 10.207 by 8m.

The existing culverts at km 9.136 and km 9.68 will be replaced with larger culverts. All the road upgrading activities will take place within the existing road reserve.

Refer to Figure 1.

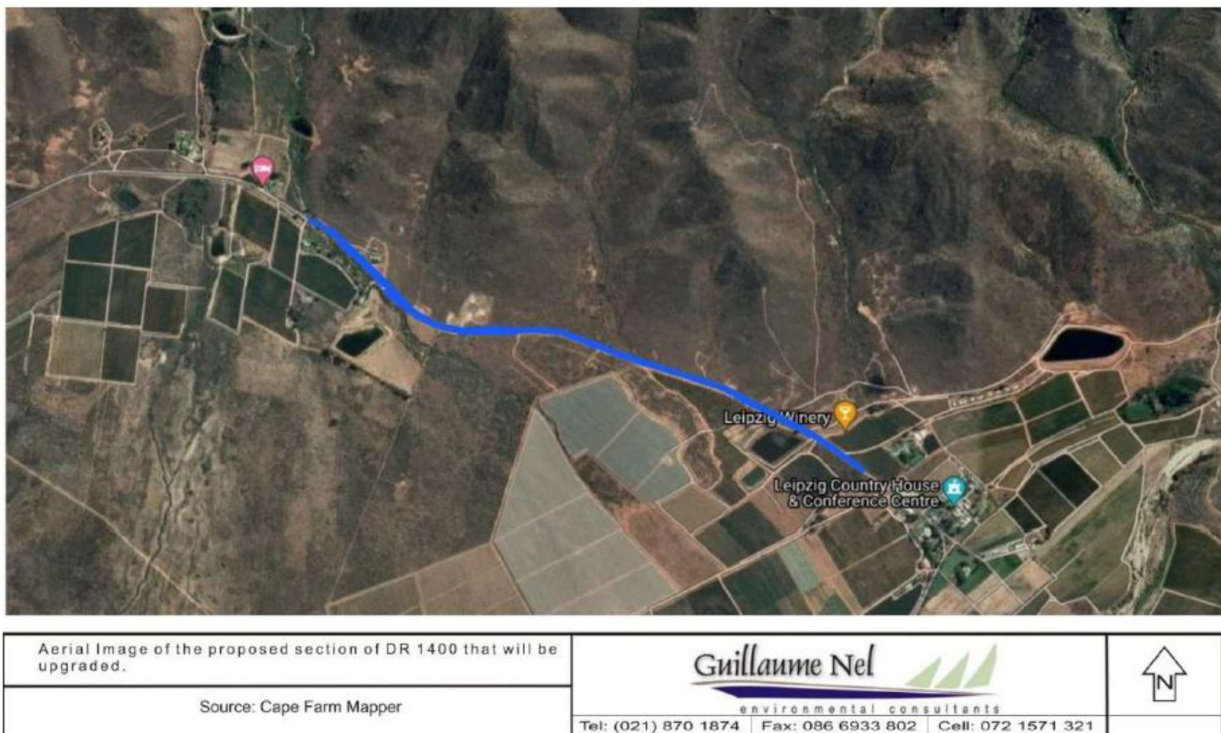


Figure 1: Proposed location of Divisional Road DR1400 from km 8.2 to km 10.21, Nuy Station.

## 5 METHODOLOGY

Information was obtained from the following sources:

- Environmental Control Officer (ECO)
- Site Manager
- Environmental Authorisation (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 **10 April 2026**.

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 Alternative described in the BAR received on 27 May 2022 on the site as described in Section C above.	Listed activities have commenced on site, as per the preferred layout.	Compliant
2	<p>The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.</p> <p>(a) A period of <b>five years</b> from the date of issue, during which period the holder must commence with the authorised listed activities.</p> <p>This Environmental Authorisation is granted for-</p> <p>(b) A period of <b>ten (10) years</b>, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities must be concluded.</p>	EA is dated 12 September 2022 ( <b>Appendix 1</b> ). The holder of the EA commenced with the activities in August 2024 (according to the ECO Monitoring Reports). This is within the stipulated validity period. The Holder of the EA therefore has until August 2034 to complete the authorised proposal. The holder is therefore within the required timeframe.	Compliant
3	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.
4	Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	No deviations from the approved alternative were noted during the Audit Site Inspection.	Compliant
5	<p>Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities.</p> <p>5.1 The notice must make clear reference to the site details and EIA Reference number given above.</p> <p>5.2 The notice must also include proof of compliance with the following conditions described herein:</p> <p>Conditions: 6, 7, 11 and 18.</p>	The competent authority was informed in writing on 2 May 2024, by the appointed ECO, that activities will commence within 7 days from the date of the letter. The letter contained all the required information and proof of conditions 6, 7, 11 and 18. A copy of the Commencement Letter is attached as <b>Appendix 2</b> .	Compliant
6	<p>The holder must in writing, within 14 (fourteen) calendar days of the date of this decision–</p> <p>6.1 notify all registered Interested and Affected Parties (“I&amp;APs”) of –</p> <p>6.1.1 the outcome of the application;</p> <p>6.1.2 the reasons for the decision as included in Annexure 3;</p> <p>6.1.3 the date of the decision; and</p> <p>6.1.4 the date when the decision was issued.</p> <p>6.2 draw the attention of all registered I&amp;APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2014 (as amended) detailed in Section G below;</p> <p>6.3 draw the attention of all registered I&amp;APs to the manner in which they may access the decision;</p> <p>6.4 provide the registered I&amp;APs with:</p> <p>6.4.1 the name of the holder (entity) of this Environmental Authorisation,</p>	<p>Refer to <b>Appendix 3</b> for a copy of the EA notification letter and proof of sending is included as Appendix A of the Commencement Letter attached as <b>Appendix 2</b> to this report.</p> <p>All required information is included in the EA Notification Letter and it was sent within the prescribed timeframes to the registered I&amp;APs.</p>	Compliant

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	<p>6.4.2 name of the responsible person for this Environmental Authorisation,          6.4.3 postal address of the holder,          6.4.4 telephonic and fax details of the holder,          6.4.5 e-mail address, if any, of the holder, and          6.4.6 contact details (postal and/or physical address, contact number, facsimile and e-mail address)          of the decision-maker and all registered I&amp;APs in the event that an appeal is lodged in terms of the          2014 National Appeals Regulations (as amended).</p>		
7	<p>The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&amp;APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.</p>	<p>The EA was issued on 12 September 2022, and the I&amp;AP's were notified on the 13 September 2022. Construction activities were set to commence in August 2024, according to the ECO Monitoring Reports, which is more than 20 days after the appeal period.</p>	Compliant
8	<p>The draft Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.</p>	<p>It was evident from the ECO Monitoring Reports (some of the ECO Monitoring Reports are included as <b>Appendix 4</b>) and during the audit site inspection that the EMPr was and is being implemented on site.</p>	Compliant
9	<p>The Maintenance Management Plan ("MMP") adopted as part of this Environmental Authorisation must be implemented.</p>	<p>The Holder must ensure the MMP is implemented during all maintenance activities within the watercourses.</p>	Not Auditable
10	<p>The EMPr and MMP must be included in all contract documentation for all phases of implementation</p>	<p>The Auditor is unable to confirm if the EMPr has been included in the contract documentation for the Contractor. The ECO has confirmed that the EMPr was included in the tender/contract document. There is a signed declaration of understandings for the Contractor, Engineer and the Developer in the Contractor's file on site, confirming that the project team are aware of the EMPr and that it will be implemented during the construction phase. Refer to <b>Appendix 5</b> for a copy of the EMPr.</p>	Compliant
11	<p>The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before commencement of the proposed development to ensure compliance with the provisions of the EMPr, and the conditions contained herein. The ECO must conduct site visits as prescribed in the EMPr and must submit ECO Reports on a monthly basis to the competent authority.</p>	<p>Doug Jeffery Environmental Consultants (Pty) Ltd have been appointed to conduct ECO monitoring services for the duration of the construction phase. The ECO was appointed prior to commencement of activities. The ECO visits the site every 2 weeks. It is the Auditor's understanding that the ECO Reports are submitted to the competent authority on a monthly basis.</p>	Compliant
12	<p>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.</p>	<p>All the documents required in terms of Condition 12 were observed in the Environmental File at the site office in Worcester, by the Auditor during the previous Audit Site Inspection.</p>	Compliant
13	<p>Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.</p>	<p>No issues with regards to accessing the site were noted during the audit site inspection.</p>	Compliant
14	<p>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, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person, that is not the ECO referred to in Condition 11 above and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014.</p>	<p>Lindsay Speirs trading as Earth Grace Environmental Consultancy was appointed to conduct required Audits in terms of Regulation 34 of the EIA Regulation 2014, as amended. Lindsay Speirs was not the EAP or ECO involved in this application and is therefore considered independent.</p>	Compliant

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	<p>14.1. The holder must undertake an environmental audit and submit an Environmental Audit Report to the Competent Authority once every 6months for the during of construction activities.</p> <p>14.2. A final Environmental Audit Report must be submitted within three months after the development is completed.</p> <p>The audit reports must be compiled and subsequently submitted to the Department in the following manner: 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&amp;APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).</p>	<p>This Audit Report contains all information as required by Appendix 7 of the EIA Regulations 2014, as amended.</p> <p>Audits must be conducted bi-annually. The previous audit was conducted in October 2025 and this audit 6 months thereafter (April 2026), as prescribed in Condition 14.</p> <p>Registered I&amp;APs will be notified of the Audit Report.</p>	
15	<p>Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.</p> <p>Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); 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 with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.</p>	<p>No heritage remains were reported to the ECO or Auditor.</p> <p>A cemetery is located in close proximity to the road reserve and construction area. The cemetery had been demarcated with construction netting, to ensure no disturbance takes place to the cemetery – see photographs in Section 10.</p>	Compliant
16	<p>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.</p>	<p>Noted. No archaeological or paleontological finds have been reported to date.</p>	Compliant
17	<p>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 landfill licensed in terms of the applicable legislation.</p>	<p>No recycling of waste was evident on site. The demarcated waste area that was noted during the last audit appeared to be in disrepair and should be reinstated.</p> <p>It is recommended that slips must be provided to the ECO to show proof of disposal of waste to the landfill site.</p>	Partial non-compliance
18	<p>The development areas must be clearly demarcated prior to the commencement of the proposed development. All areas outside the demarcated areas must be regarded as “no-go” areas.</p>	<p>Certain sections along KM8.2 - KM10.21 were already fenced off with existing fencing. There are sections along KM8.2 - KM10.21 without any fencing. These areas were demarcated with droppers painted red.</p>	Compliant

**7 COMPLIANCE WITH THE CONDITIONS OF THE EMPr**

Description of Management Action	Comments on Compliance	Compliance
<p><b>Awareness (Induction) Training</b>                      The EO or ESO, or ECO are responsible in ensuring everyone on site is given an environmental awareness induction session which not only clearly defines what the environment is and specifics detailing the local environment but outlines the requirements of the EMPr as a management tool to protect the environment.</p> <p>Refresher courses must be conducted as and when required. The EO or ESO must ensure daily toolbox talks include alerting the workforce to particular environmental concerns associated with the tasks for that day or the area/habitat in which they are working. Awareness posters and a handout must be produced to create awareness throughout the site.</p>	<p>All staff currently working on site have undergone environmental induction. A signed environmental induction register was observed in the Environmental File at the site office during the previous audit.</p>	<p>Compliant</p>
<p><b>Site Documentation</b>                      The following is a list of documentation that must be held on site and must be made available to the ECO and/or DEA&amp;DP on request.</p> <ul style="list-style-type: none"> <li>• Access negotiations and physical access plan</li> <li>• Site daily diary /instruction book</li> <li>• Records of all remediation / rehabilitation activities</li> <li>• Copies of EO reports (management and monitoring)</li> <li>• Environmental Management Programme (EMPr)</li> <li>• Complaints register.</li> </ul>	<p>The required documents were included in the Environmental File at the Site Manager's office. .</p>	<p>Compliant</p>
<p><b>Pro forma documentation</b>  <i>Prior to the commencement of construction activities</i>                      The following attached pro forma documentation is to be filled out and is binding to the EMPr and project contract and includes, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Declaration of understanding by the Developer</li> <li>• Declaration of understanding by the Contractor</li> </ul> <p><i>During construction activities</i>                      The following attached pro forma documentation is to be filled out and maintained. These are binding to the EMPr and project contract. They include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Environmental incidents</li> <li>• Records of all remediation / rehabilitation activities</li> </ul>	<p>The Auditor noted the required declarations in the Contractor's file at the site office during the previous audit.</p>	<p>Compliant</p>
<p><b>Visual Impact</b></p> <ul style="list-style-type: none"> <li>• Light output is to be confined within property boundaries through using specifically designed luminaries such as full cut-off luminaries to minimize upward spread of light near to and above the horizontal;</li> <li>• Spotlight luminaries to be tilted in order to direct the light to the intended spot, instead of allowing it to light areas outside its purpose;</li> <li>• Outdoor spot lights to be mounted on the appropriate pole height. Higher mounting heights allow lower main beam angles which can reduce glare;</li> </ul>	<p>No lights were noted on site.</p>	<p>Compliant</p>

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<ul style="list-style-type: none"> <li>Utilize control systems to reduce light levels during inactive periods or at predetermined times while maintaining sufficient lighting for safety and security (NEMA, 2000).</li> <li>Where vertical surfaces are illuminated, such as advertising signs or buildings façades, luminaries must light downwards.</li> </ul>		
<p><b>Traffic Impact</b> Comply with Breede Valley Municipality Road rules and signs.</p>	<p>All Breede Valley Municipality Road rules and signs are complied with.</p>	<p>Compliant</p>
<p><b>Project contract and programme</b> The EMPr must be included as part of the tender documentation thereby making it part of the enquiry document to make the recommendations and constraints, as set out in this document, enforceable under the general conditions of contract. A copy of this EMPr must be available on site. The Contractor shall ensure that all the personnel on site, sub-contractors, suppliers, etc. are familiar with and understand the specifications contained in the EMPr. It is considered imperative that all works be undertaken during the dry period to limit surface water contamination and the need for any surface water diversion during the construction works. Construction should be undertaken in the dry season and permitted working areas for the entire section of road must be clearly demarcated.</p>	<p>The ECO was unable to confirm if the EMPr had been included in the contract documentation for the Contractor. The ECO however, did confirm that the MMP was included in the tender/contract document. The Auditor noted signed declaration of understandings for the Contractor, Engineer and the Developer in the Environmental File, confirming that the project team are aware of the EMPr and that it will be implemented during the construction phase.</p> <p>A copy of the EMPr is included in the Environmental File that is kept at the site offices in Worcester.</p> <p>Works are being conducted during the dry season. Working areas were demarcated with poles/droppers.</p>	<p>Compliant</p>
<p><b>Site Demarcation And Development</b> The surveys for the overall project area and construction footprint as approved in the Environmental Authorisation (EA) must be clearly demarcated before the contractors set up their crew camps or start with construction. Minimization of the disturbances due to the road upgrade must be ensured by marking out and fencing off the development footprint prior to construction. This must be overseen by and Environmental Control Officer (ECO) The ECO must be present for the vegetation clearing period of the construction. No construction personnel or vehicles are to be allowed on the north side of the construction area in the natural vegetation. The existing transformed areas and borrow pits are to be used to storing of construction equipment and vehicles.</p>	<p>The graveyard has been demarcated with shade netting and is being treated as a no-go area as observed during the audit site inspection.</p> <p>Working areas for the entire section of road were demarcated along the road reserve with droppers and existing fencing.</p> <p>No construction personnel or vehicles were observed in the natural vegetation. Existing transformed areas and borrow pits are used to store construction equipment and vehicles.</p>	<p>Compliant</p>
<p><b>Emergencies, Non-Compliance And Communication</b> The contractor <b>must provide method statements</b> on the protocols to be followed, and contingencies to be put in place for the following, before construction may begin:</p> <ul style="list-style-type: none"> <li>Emergency spills procedures for the contamination of soils from spills and fire.</li> <li>Handling &amp; storage of oils and chemicals.</li> <li>Cement and concrete batching, which includes the storage, washing &amp; disposal of cement, packaging, tools and plant.</li> <li>Diesel tanks and refuelling procedures.</li> <li>Crew camps and construction lay down areas.</li> <li>Workshop maintenance and cleaning of plant.</li> </ul>	<p>Method Statements have been compiled and included in the Environmental File as observed by the Auditor.</p>	<p>Compliant</p>
<p><b>Freshwater Impact Assessment (Fen, 2021)</b> Site preparation prior to commencement of construction activities:</p> <ul style="list-style-type: none"> <li>Contractor laydown areas and stockpiles to be established outside of the riparian drainage line and the 32 m NEMA ZoR in</li> </ul>	<ul style="list-style-type: none"> <li>The laydown areas and stockpiles have been established outside any drainage lines or sensitive areas.</li> </ul>	<p>Compliant</p>

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<p>consultation with the appropriate authority;</p> <ul style="list-style-type: none"> <li>• All footprint areas must remain as small as possible and vegetation clearing to be limited to what is absolutely essential;</li> <li>• All works must remain within the existing road servitude;</li> <li>• Retain as much indigenous vegetation as possible;</li> <li>• Vehicles to be serviced at the contractor laydown area and all re-fuelling is to take place outside of riparian drainage line and 32m NEMA ZoR as well as outside of the delineated episodic drainage lines;</li> <li>• Utilize existing roads only to gain access to the construction site; and</li> <li>• <b>The riparian drainage line and 32 m NEMA ZoR as well as the episodic drainage lines should be clearly demarcated with danger tape by an ECO and marked as a 'no-go' area where no construction activities are planned.</b></li> </ul>	<ul style="list-style-type: none"> <li>• All works are within the existing road servitude.</li> <li>• Some disturbance to vegetation was noted where the new fence was established. These areas may require some rehabilitation.</li> <li>• No servicing of vehicles or refuelling was observed on site.</li> <li>• Only existing roads are used.</li> <li>• There are no obvious drainage channels or riparian areas on site.</li> <li>• The working areas were marked with painted droppers along the road reserve.</li> <li>• The drainage line was not clearly demarcated. It is recommended that the 32m buffer area near the laydown area be clearly demarcated.</li> </ul>	
<p><b>Botanical Impact Assessment</b></p> <p>A 'search and rescue' has been undertaken for the Mesembryanthemum varians plants and any other protected species found within the construction area. The species were transplanted immediately into fynbos areas on farms along the 2km stretch of road where no development is deemed to take place in future. These were farms on the North side of DR1400.</p> <p>Working areas for the entire section of road have been demarcated along the road reserve with droppers painted red and existing fencing. The ECO has inspected the demarcations.</p> <p>The EMPr requires that the riparian drainage line and 32 m NEMA ZoR as well as the episodic drainage lines are clearly demarcated and marked as a 'no-go' areas. These areas have been marked with droppers painted red along the road reserve. There is no obvious drainage channel or riparian area when on site. Only disturbance within the road reserve has taken place.</p>	<p>A 'search and rescue' was done and a report was done. The species were transplanted immediately into fynbos areas on farms along the 2km stretch of road where no development is deemed to take place in future.</p> <p>Working areas for the entire section of road were demarcated along the road reserve with painted droppers and existing fencing.</p> <p>The drainage line was not clearly demarcated. It is recommended that the 32m buffer area near the laydown area be clearly demarcated.</p>	<p>Compliant</p>
<p><b>Stockpiles</b></p> <ul style="list-style-type: none"> <li>• All stockpiled material must be easily accessible on site without any environmental damage of the surrounding properties.</li> <li>• All temporarily stockpiled material must be stockpiled in such a way that the spread of materials are minimised.</li> <li>• In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.</li> <li>• The stockpiles may only be placed within the demarcated areas, the location of which must be approved by the RE, EO or ECO.</li> <li>• Stockpiles may not exceed 2 metres in height and their footprint should be kept to a minimum. Stockpiling of removed materials may only be temporary and should be disposed of at a registered waste disposal facility.</li> <li>• All exposed soils must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles.</li> <li>• All stockpiled material must be easily accessible on site without any environmental damage of the surrounding properties.</li> <li>• All temporarily stockpiled material must be stockpiled in such a way that the spread of materials are minimised.</li> <li>• In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.</li> <li>• The stockpiles may only be placed within the demarcated areas, the location of which must be approved by the RE, EO or ECO.</li> <li>• Stockpiles may not exceed 2 metres in height and their footprint should be kept to a minimum. Stockpiling of removed materials</li> </ul>	<p>Stockpiles observed during the Audit Site Inspection were below the required height and placed within laydown area or within working areas.</p> <p>The drainage line was not clearly demarcated. It is recommended that the 32m buffer area near the laydown area be clearly demarcated so as to avoid encroachment of stockpiles within that area.</p>	<p>Compliant</p>

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<p>may only be temporary and should be disposed of at a registered waste disposal facility.</p> <ul style="list-style-type: none"> <li>All exposed soils must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles.</li> <li>Stormwater runoff from the stockpile sites and other related areas must be directed into the storm water system.</li> <li>Stockpiles are to be stabilised if signs of erosion are visible.</li> <li>Stockpiles may not exceed 2 m in height, and their footprint should be kept to a minimum. Stockpiling of removed materials may only be temporary (may only be stockpiled during the period of clearing at a certain crossing point) and should be disposed of at a registered waste disposal facility.</li> <li>Contractor stockpiles to be established outside of the riparian drainage line and the 32 m NEMA ZoR in consultation with the appropriate authority.</li> </ul>		
<p><b>Topsoil Management</b>  All topsoil must be removed prior to the commencement of any construction activities. Topsoil must be stockpiled.  Stockpiled topsoil must be regarded as no-go areas.  Stockpiled topsoil must be monitored for invasive exotic vegetation growth. Contractors must remediate as and when required in consultation with the EO, RE and ECO.</p>	<p>Topsoil is stored within the laydown area as approved by the ECO.</p>	<p>Compliant</p>
<p><b>Oil and chemicals</b>  The contractor must provide method statements for the “handling &amp; storage of oils and chemicals”, “fire”, and “emergency spills procedures”.  These substances must be confined to specific and secured areas within the contractor’s camp, and in a way that does not pose a danger of pollution even during times of high rainfall.</p>	<p>The required Method Statements have been compiled and approved. No oil or chemicals were noted on site during the Audit Site Inspection.</p>	<p>Compliant</p>
<p>Drip trays (minimum of 10cm deep) must be placed under all machinery and vehicles.  The surface area of the drip trays will be dependent on the vehicle and must be large enough to catch any hydrocarbons that may leak from the vehicle while standing.  The depth of the drip tray must be determined considering the total amount / volume of oil in the vehicle.  The drip tray must be able to contain the volume of oil in the vehicle.</p>	<p>No stationery vehicles were noted during the Audit Site Inspection.   A drip tray was noted below a generator that was operational on site. Another generator that was not in operation was on site without a drip tray. See Section 10 for photographs.</p>	<p>Partial non-compliance</p>
<p>Any spills larger than 100ℓ should be reported to all local authorities.  Spill kits must be available on site and in all vehicles that transport hydrocarbons for dispensing to other vehicles on the construction site.  Spill kits must be made up of material/product that is in line with environmental best practice (sunsorb is a recommended product that is environmentally friendly).  All spilled hazardous substances must be contained in impermeable containers for removal to a General &amp; Hazardous Waste Landfill site, (this includes contaminated soils, and drenched spill kit material).  Vehicles to be serviced at the contractor laydown area and all refuelling to take place outside of the watercourses and the applicable setback zone.  In the event of a vehicle breakdown, maintenance of vehicles must take place with care and the recollection of spillage should be practiced near the surface area to prevent ingress of hydrocarbons into topsoil and subsequent habitat loss;  All spills should they occur, should be immediately cleaned up and treated accordingly.</p>	<p>No spill kits were noted on site. Spill kits must be kept either where staff are working or at the laydown areas.   Leakage or spill of a black substance was noted at the laydown area. This spill will need to be cleaned and treated accordingly. Refer to photographs in Section 10.   No servicing of vehicles or refuelling was observed on site during the inspection.</p>	<p>Partial non-compliance</p>
<p><b>Concrete</b></p>	<p>No cement mixing was noted during the Audit Site Inspection.</p>	<p>Not Auditable</p>

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<p><b>Dangerous And Toxic Materials</b>                  Materials such as fuel, oil, paint, herbicide and insecticides must be sealed and stored in bermed areas or under lock and key, as appropriate, in well-ventilated areas.                  Storage facilities should be bunded, roofed, secure, rain, wind and tamper proof.                  Storage areas shall display the required safety signs depicting "no smoking", "No Naked lights" and "Danger" containers shall be clearly marked to indicate contents as well as safety requirements.                  Sufficient care must be taken when handling these materials to prevent pollution. Training on the handling of dangerous and toxic materials must be conducted for all staff prior to the commencement of construction.                  Empty containers shall be removed to a General Hazardous Waste Landfill site.  <b>Material Safety Data Sheets (MSDS)</b> must be prepared for all hazardous substances on site and supplied by the supplier where relevant. MSDS's must be updated as required.</p>	<p>3 large drums were noted on site and were not stored within a bunded or protected area. One appeared empty while the other 2 were full and sealed. There was a spill or leak below the empty one. It is uncertain what the substance is since the containers are not marked and there was no signage within the vicinity of the drums. Refer to the photographs in Section 10.</p> <p>Safety Datasheets should be presented to the ECO and kept on file at the Site Office.</p>	<p>Partial non-compliance</p>
<p><b>Bulk storage of fuels and oils</b></p>	<p>No bulk storage of fuel was observed on site.</p>	<p>Not Auditable</p>
<p><b>Use of dangerous and toxic materials.</b>                  The contractor shall keep the necessary materials and equipment on site to deal with spills/ fire of the materials present should they occur.                  The contractor shall set up a procedure for dealing with spills/ fire, which will include notifying the ECO and the relevant authorities prior to commencing with construction. These procedures must be developed in consultation and approval by the appointed EO.                  All staff should receive some form of fire training. Fire buckets and hoses shall be in good working order and easily accessible on site.                  A record must be kept of all spills and the corrective action taken.</p>	<p>The required emergency method statements are in place.                  The Contractor appointed a company to conduct fire training with all staff on site.                  Fire hydrants were observed on site.</p>	<p>Compliant</p>
<p><b>Eating Areas And Camp Followers</b>                  The Contractor shall, in conjunction with the EO, designate the restricted eating area for eating during normal working hours. Two refuse bins with lids must be provide and maintain a method statement provided and cleaned on a daily basis. The bins are to be secure, wind, weather and scavenger proof.                  Designated areas for smoking must be provided.                  No fires are to be lit outside of a facility designed to contain fires. The adequacy and positioning of these structures must be determined in consultation with the EO and ECO.                  No animals, domestic or otherwise are allowed on the premises. The feeding, or leaving of food, for stray or other animals in the area is strictly prohibited.                  Camp followers/informal traders must not be allowed to congregate on pavements or outside the construction site. However, at the contractor's discretion facilities can be made available within the designated eating area.                  Litter (even if originating outside the camp) and concrete bags etc. must be picked up and put into suitably closed bins.</p>	<p>The Auditor noted a designated shaded eating area within the laydown area but appears unused.                  No bins are provided.                  Designated smoking areas were not noted.                  The demarcated waste area was no longer evident on site. Waste and excess materials/equipment was randomly stored within the laydown areas.                  A significant amount of litter was noted on site.</p>	<p>Compliant</p>
<p><b>Toilets And Ablution Facilities</b>                  The contractor will be responsible for providing all sanitary arrangements for his and the sub-contractors team. It is proposed that that one toilet for 15 people will be established on site.                  Sanitary arrangements shall be to the satisfaction of the ECO and the local authority. The contractor shall keep the toilets in a clean, neat and hygienic condition. The contractor shall supply toilet paper at all toilets at all times. Toilet paper dispensers shall be provided in all toilets.                  Toilets provided by the contractor must be easily accessible and a maximum of 150m from the works area to ensure they are utilised.                  All toilets will be located within the contractor's camp. Should toilets be needed elsewhere, their location must first be approved by the RE, EO or ECO.                  The contractor (who must use reputable toilet-servicing company) shall be responsible for the cleaning, maintenance and servicing of</p>	<p>Mobile chemical toilets were available where work was being carried out on site. Toilets appeared in a good condition but were not secured. This area is usually very windy and it would be advisable that these toilets are secured to the ground. Refer to Section 10.</p>	<p>Compliant</p>

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<p>the toilets. The contractor (using reputable toilet-servicing company) shall ensure that all toilets are cleaned and emptied before the builders' or other public holidays. Toilets out on site must be secured to the ground and have a sufficient locking mechanism operational at all times.</p>		
<p><b>Waste Management</b></p>	<p>Waste is not recycled or sorted into recyclable elements on site, however, minimal waste is generated. The demarcated waste area was no longer evident on site. Waste and excess materials/equipment was randomly stored within the laydown areas. A significant amount of litter was noted on site.  It is recommended that the waste area be reinstated within the laydown area and that waste be stored within this area. The entire site must be cleared of all litter.</p>	<p>Partial non-compliance</p>
<p><b>Dust</b> It is imperative that method statements regarding dust control be supplied to the ECO by the contractor prior to the commencement of any construction activities. Dust management and dust suppression during the construction phase is deemed very important. The method statement must provide information on the proposed source of water to be utilised and the details of the licenses acquired for such usage. Potable water may not be used as a means of dust suppression, alternative measures must be sourced. The use of 'grey' water must be investigated as an alternative. The contractor will be responsible to source this water and obtain the required approvals. Dust mitigation measures to include the use of chemical dust suppressants, such as Lignosulphonates; and the use of soil stabilisers such as straw for large open ground areas. The construction camp shall be treated with dust suppression during dry and windy conditions to control dust fallout. Dust production must be controlled by regular dust suppression of roads and works area, should the need arise. <b>(NB: Concrete dust is toxic and damages soil properties. Therefore, dust suppression to prevent dust spread must not be done where concrete dust has fallen, or it will infiltrate into the soil. Concrete bags must not be allowed to blow around the site and spread cement dust.)</b> At the end of construction, the site camp must be fully rehabilitated by removing the temporary surface, ripping the area to loosen the soil. All vehicles transporting material that can be blown off (e.g. soil, rubble etc.) must be covered with a tarpaulin, and speed limits of 20 km/h must be adhered to.</p>	<p>Minimal dust was observed during the site inspection.</p>	<p>Compliant</p>
<p><b>Workshop equipment, maintenance and storage</b> The contractors must provide and maintain a method statement for "workshop maintenance and cleaning of plant". All maintenance and washing of vehicles and equipment shall be done off-site as far as possible. During servicing of vehicles or equipment, a suitable drip tray shall be used to prevent spills onto the soil. Leaking equipment shall be repaired immediately or be removed from site to facilitate repair. Workshop areas shall be monitored for oil and fuel spills and such spills shall be cleaned and remediated to the satisfaction of the EO or RE. Cleaning and remediation must be done with products or similar approved products that are in line with best environmental practice i.e. Sunisorb, or similarly approved. The Contractor shall be in possession of an emergency spill kit that must be complete and available at all times on site. The Contractor must ensure that senior and the other relevant members of the workforce are trained in dealing with spills by using emergency spill</p>	<p>The required method statement has been compiled.  No maintenance, servicing or washing of vehicles was noted on site.  No spill kits were observed on site.</p>	<p>Compliant</p>

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<p>kits. All spills of hazardous substances must be reported to the ESO, EO, RE or ECO. The contractor must comply with the regulations of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) as well as specific specifications set forth by the health and safety agent. The existing transformed areas and borrow pits are to be used to storing of construction equipment and vehicles.</p>		
<p><b>Noise</b> All construction vehicles must be in a good working order to reduce possible noise pollution. Work hours during the construction phase shall be strictly enforced unless permission is given (07H00 – 18H00). Permission shall not be granted without consultation with the local industries and businesses by the EO. No work to be done on Sundays. Noise reduction is essential, and Contractors shall endeavour to limit unnecessary noise, especially loud talking, shouting or whistling, radios, sirens or hooters, motor revving, etc. The use of silent compressors is a specific requirement. All machinery to be muffled where possible. Noisy activities shall take place only during working hours. The EO must inform the residents of houses and businesses adjacent to the development in writing 24 hours prior to any planned activities that will be unusually noisy or any other activities that could reasonably have an impact on the adjacent sites. These activities could include, but are not limited to use of pneumatic jack-hammers and compressors etc. No noise louder than 70dB from the ambient noise level. Machinery and equipment on site must be maintained so as to avoid any unnecessary noises.</p>	<p>No excessive noise was experienced during the Audit Site Inspection.</p>	<p>Compliant</p>
<p><b>Crew camps</b> Accommodation for members of the workforce will not be permitted on site unless authorisation has been given in terms of the Environmental Authorisation issued for the site. If accommodation is to be provided for workers, details need to be provided as to the location and facilities to be provided for the workers. Dedicated wash areas must be situated away from surface water sources. The contractor's camp shall be monitored for dust fallout and dust suppression applied as required. This may include the laying of gravel; the use of grey water can be considered as an option if the required permits have been acquired. The contractor's camp, offices and storage facilities shall be located within the site boundaries. If this is not feasible an alternative should be designated in consultation with the ECO. The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure compliance with this requirement. Crew camps must be established outside of the delineated watercourse. The contractor shall be responsible for cleaning the contractor's camp and construction site of all structures, equipment, residual litter and building materials at the end of the construction period and, the topsoil restored in areas where landscaping is to take place.</p>	<p>No crew are accommodated on site.  The site camp/offices for Road-Mac are situated in Worcester.  The site camp was neat and tidy and no dust was noted in the site camp area.</p>	<p>Compliant</p>
<p><b>Visual Impact</b> The site must be kept tidy at all times. Building material stockpiles must be protected from dispersion into the surrounding area by wind or water.</p>	<p>Housekeeping could be improved.</p>	<p>Compliant</p>
<p><b>Fires</b> The contractors must provide and maintain a method statement for "fires", clearly indicating where and for what fires will be utilised plus details on the fuel to be utilised in creating the fire. Fire training and equipment to be nearby to put fires out. No wood is to be collected from private or public property. Fires must be within designated areas and must be in small scale. Absolutely no burning of waste is permitted. Fires will only be allowed in facilities especially constructed for this purpose within fenced Contractor's camps. Wood and/or charcoal</p>	<p>Required Method Statement is in place.  Fire hydrants are available on site and at the site camp.  No burning of waste or cooking fires were noted on site.</p>	<p>Compliant</p>

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<p>are the only fuels permitted to be used for fires. The contractor must provide sufficient wood (fuel) for this purpose.          Fires in the designated areas must be small in scale so as to prevent excessive smoke being released into the atmosphere.          Heavy smoke may not be released into the air.          No felling of trees or wood collection is allowed from private or public property.          The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.          The construction should comply with SANS 10400 of 2011 and the Community Fire Safety By-Law, Provincial Gazette 5832 (as amended 29 June 2007 and 21 August 2015), with reference to:          Detailed fire protection plans should be submitted by a competent person – fire engineer for perusal of future building plan submissions;          Fire hydrants to be provided as per SANS 100400 T4.35;          No window, door or unprotected openings shall be closer than 3 m of an open space stair as per SANS 10400 T4.27.2;          Access for emergency vehicles as per Chapter 3 Section 12 of the Community Fire Safety By-law.</p>		
<p><b>Erosion and sedimentation</b>          To reduce the loss of material by erosion, the contractor shall ensure that disturbance on site is kept to a minimum. The disturbance especially includes the movement of heavy vehicles.          In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.          Any erosion or gully formation must be identified on an ongoing basis and re-profiled and revegetated accordingly.          A monitoring plan for the development and the immediate zone of influence should be implemented to prevent erosion and incision.          Areas where bank failure is observed as a result of construction works should be immediately repaired, by infilling the erosion gully with in situ material, compacting it to a suitable density to still allow for revegetation, and ensuring the slope of the embankment is 3:1.          All exposed soil must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) to prevent erosion and sedimentation of the riparian drainage line.          The soil surrounding the upgraded culvert structures must be suitably loosened on completion of construction activities and revegetated to prevent erosion.          The soil surrounding the constructed culvert structures must be suitably loosened on completion of construction activities and revegetated to prevent erosion.</p>	<p>No erosion or sedimentation were observed during the Audit Site Inspection.</p>	<p>Compliant</p>
<p><b>Fauna</b>          The regulations of the Animal Protection Act, 1962 (Act No. 71 of 1962); and Marine Living Resources Act, 1998 (Act No. 18 of 1998).          All construction workers must be informed that the intentional killing of any animal is not permitted as faunal species are a benefit to society. Poaching is illegal and it must be a condition of employment that any employee caught poaching will be dismissed. Employees must be trained on how to deal with fauna species as intentional killing will not be tolerated. In the case of a problem animal e.g. a large snake a specialist must be called in to safely relocate the animal if the EO or ECO is not able to.</p>	<p>No animals were noted on site during the Audit Site Inspection.           According to the ECO, staff have received training regarding the protection of fauna.</p>	<p>Compliant</p>
<p><b>Flora</b>          The ECO must visit the site twice a week after the initial clearing has been completed to ensure no unnecessary loss of vegetation occurs.          The ECO must be present for the vegetation clearing period of the construction.          Rehabilitation to take place in accordance with the Rehabilitation Plan compiled by GNEC. An Alien Management Plan has also been compiled by GNEC.          Clearing of plant material and debris in the identified drainage line which the road crosses must be done by hand as far as possible and if machinery is required it should not be permitted to drive within the stream but should operate from the banks.</p>	<p>The ECO has been conducting biweekly site visits.           According to the ECO Reports, the ECO was present during clearing activities.</p>	<p>Compliant</p>

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<p><b>Heritage</b>          In terms of the National Heritage Act, 1999 (Act No. 25 of 1999), should any archaeological artefacts be exposed during construction activities, work on the area where the artefacts were found shall cease immediately and the ECO as well as the Local Council shall be notified within 24 hours. Finds of human remains must be treated as a crime scene.          Upon receipt of such notification, the ECO will arrange for the excavation to be examined by an Archaeologist.          Under no circumstances shall archaeological artefacts be removed, destroyed or interfered with.          Any archaeological sites exposed during demolition or construction activities must not be disturbed prior to authorisation by the Heritage Western Cape and/or the South African Heritage Resources Agency or the appropriate provincial heritage resource agency.</p>	<p>No heritage resources, artefacts or remains were noted during the Audit Site Inspection. According to the ECO, no remains or artefacts have been reported.           A cemetery is adjacent to a portion of the site. The cemetery has been demarcated with shade netting to prevent disturbance to the graves.</p>	<p>Compliant</p>
<p><b>No-go / sensitive areas</b>          Stockpiled topsoil should be demarcated with danger tape and seen as no-go areas.          Minimization of the disturbances due to the road upgrade must be ensured by marking out and fencing off the development footprint prior to construction.          No construction personnel or vehicles are to be allowed on the north side of the construction area in the natural vegetation.          The riparian drainage line and 32 m NEMA ZoR as well as the episodic drainage lines should be clearly demarcated with danger tape by an ECO and marked as a 'no-go' area where no construction activities are planned.          All construction activities must remain within the boundaries of the development area, as demarcated at the start of the construction phase. The construction footprint must be kept to a minimum by constructing boundaries and demarcation around areas not to be disturbed.          These No-go areas must be demarcated with fencing / warning tape and signs before any construction activities commence. The EO and ECO must be on site in order to make sure the correct areas are fully demarcated.</p>	<p>The topsoil stockpiles have been placed within the laydown area.           The working area was demarcated with painted droppers.           A cemetery has been located in close proximity to the road reserve and construction area. The no-go demarcation at the cemetery consists of shade netting.</p>	<p>Compliant</p>
<p><b>Access route/haul roads</b>          Any authorised clearing for access roads must be done under the supervision of the ECO.          Access roads for earthmoving-equipment must be clearly designated and be positioned as close as possible to the proposed development site. No driving off from the marked roads is permitted and designated parking areas must be identified and demarcated with applicable signage.          Neither the site nor its access roads must be allowed to be utilised for recreational activities, this includes but is not limited to quad bikes, 4x4's and dirt bikes. Security personnel ensure that this is enforced. No unauthorised access is permitted.          Utilize existing roads only to gain access to the construction site.</p>	<p>Existing roads were used to access the construction area.</p>	<p>Compliant</p>
<p><b>Crime, safety and security</b>          No site staff, other than security personnel and skeleton staff shall be housed on site unless otherwise stipulated in the Environmental authorisation. Security personnel and skeleton staff shall be supplied with adequate protective clothing, ablution facilities, water and refuse collection facilities. A boundary fence will serve to prevent public access to the site office, for public safety and security reasons. The access to the site must be controlled so as to restrict unauthorised personnel from entering the site. The workers on site must retain some means of identification. The ESO and the contractor are responsible for ensuring that only authorised personnel are on site at all times.          The site and crew are to be managed in strict accordance with the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) and the National Building Regulations.          Site specific conditions and regulations as set forth by the health and safety agent should also be adhered to.          The contractor shall ensure that all emergency procedures are in place prior to commencing work. Emergency procedures shall include (but not be limited to) fire, spills, contamination of the ground, accidents to employees, use of hazardous substances and materials,</p>	<p>No staff are housed on site.           Access to the site is controlled with a stop and go system.</p>	<p>Compliant</p>


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<p>etc. The contractor shall ensure that lists of all emergency telephone numbers / contact persons are kept up to date and that all numbers and names are posted at relevant locations throughout the construction site. The nearest emergency service provider must be identified during all phases of the project as well as its capacity and the magnitude of accidents it will be able to handle. The contact details of this emergency centre, as well as the police and ambulance services must be available at prominent locations around the construction site and the construction crew camps.</p>		
<p><b>Visual impact</b> Shade cloth must be utilised to conceal and minimise the visual impact of contractor camps, lay down and storage areas. Rubble and litter must be removed every two weeks or more often as the need arises and be disposed of at a registered landfill site as designated by the Breede Valley Municipalities Solid Waste removal department.</p>	<p>Housekeeping can be improved.</p>	<p>Compliant</p>
<p><b>Hydrology</b> All footprint areas must remain as small as possible and vegetation clearing to be limited to what is absolutely essential. Retain as much indigenous vegetation as possible. Vehicles to be serviced at the contractor laydown area and all re-fuelling is to take place outside of riparian drainage line and 32 m NEMA ZoR as well as outside of the delineated episodic drainage lines. All construction works for the proposed upgrade activities should be undertaken during the drier periods, to minimise any impact on the hydrological functioning of the downstream watercourse Areas where bank failure is observed as a result of construction works should be immediately repaired, by infilling the erosion gully within situ material, compacting it to a suitable density to still allow for revegetation, and ensuring the slope of the embankment is 3:1. All alien and invasive vegetation species, debris and litter removed from the DR 1400 road reserve must be removed from site. Removed materials must be stockpiled outside the delineated extent of the riparian drainage line and must be disposed of at a registered disposal facility. All maintenance footprint areas to remain as small as possible and vegetation clearing to be limited to what is essential and may not extend beyond the road reserve. Contractor laydown areas and stockpiles to be established outside of the riparian drainage line and the 32 m NEMA ZoR in consultation with the appropriate authority; It is considered imperative that all works be undertaken during the dry period to limit surface water contamination and the need for any surface water diversion during the construction works; All construction footprint areas to remain as small as possible and vegetation clearing to be limited to what is essential and may not extend beyond the road reserve; The clearing activities should be limited to only what is necessary; Limit construction equipment within the watercourses to what is essential; Stockpiles may not exceed 2 m in height, and their footprint should be kept to a minimum. Stockpiling of removed materials may only be temporary (may only be stockpiled during the period of clearing at a certain crossing point) and should be disposed of at a registered waste disposal facility; All exposed soil must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) to prevent erosion and sedimentation. The soil surrounding the upgraded culvert structures must be suitably loosened on completion of construction activities and revegetated to prevent erosion. Ensure alien and invasive plant species are managed post rehabilitation activities until suitable basal cover is achieved.</p>	<p>Removal of natural vegetation was limited to within the road reserve. Some disturbance of vegetation along sections of the new fence line was noted. Rehabilitation may be required in some areas.</p> <p>No servicing of vehicles were noted on site.</p> <p>Current construction activities are occurring during the drier period. Laydown area is outside any watercourse.</p> <p>Stockpiles are within the required height restriction.</p> <p>No movement of people or vehicles were noted outside the designated working areas.</p> <p>Working area was demarcated with painted droppers.</p>	<p>Compliant</p>

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<p>The construction footprint must be limited to the road reserve and the width of the culvert crossing and an additional 5 m construction area (to allow for the stockpiling and movement of personnel). The area must be rehabilitated after the completion of the construction phase, including revegetation thereof with suitable terrestrial vegetation of the Breede Alluvium Renosterveld and Breede Shale Renosterveld vegetation types (Mucina and Rutherford, 2010) at the proposed culverts. In addition, AIP eradication surrounding the culverts must be undertaken.</p> <p>All outlets must be designed to allow stormwater to disperse across the outlet channel before releasing into the downgradient systems. This will prevent incision and scouring.</p> <p>The outlet channel of the proposed culverts must be lined with cobbles and revegetated with indigenous species to assist with water dispersal and reduction of water velocities as they flow to downgradient areas.</p> <p>Avoid unnecessary trampling of vegetation irrespective of the vegetation being associated with the watercourses or the surrounding terrestrial area.</p> <p>The soil surrounding the constructed culvert structures must be suitably loosened on completion of construction activities and revegetated to prevent erosion.</p> <p>Ensure alien and invasive plant species are managed post construction until suitable basal cover is achieved.</p> <p>Material used as rip rap or to fill the gabion baskets should be in situ material preferably originating from the surrounding area, however, it must be sustainably sourced. Alternatively, any imported material must be weed free and not be contaminated by any potential pollutants.</p> <p>Once gabions are constructed and/or the rip rap installed, the surrounding natural embankments should be reprofiled and revegetated with indigenous species as soon as possible.</p> <p>The gabion structures (where applicable) should be monitored for erosion and structural integrity after each rainfall event (especially during the rainy winter season) until suitable basal vegetation cover has re-established.</p> <p>Use of biodegradable hessian sheeting must be made to prevent sedimentation of downgradient resources.</p> <p>Construction personnel must be limited to the existing road reserve only, and no movement within the delineated riparian drainage line or episodic drainage lines may be permitted;</p> <p>In instances where the road reserve needs to be widened (i.e. between km marker 8.19 and 10.15) in order to accommodate adequate sloping of areas requiring cut and fill, the area to be impacted must be adequately demarcated and all personnel must be made aware to not impact the riparian drainage line further;</p> <p>Where necessary, all embankments must be adequately sloped, ripped, topsoil reinstated and vegetated with indigenous riparian vegetation species.</p> <p>During resurfacing/painting, it must be ensured that no foreign materials (i.e. tar from the resurfacing activities) enter the riparian drainage line or episodic drainage lines which could result in the contaminants being washed downstream;</p> <p>Care must be taken while painting and all personnel must receive training on the risks of chemical contamination of the watercourses; and</p> <p>If any solid materials do enter the watercourse, they should be immediately removed and disposed at a registered waste disposal facility. Paint spills on soil within and surrounding the riparian habitat should be immediately remediated.</p>		
<p><b>Soil</b> Topsoil must be stripped from all areas that are to be utilized during the construction period and where permanent structures and access is required. These areas will include comprising the permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas.</p>	<p>Topsoil is stockpiled within the laydown area to be used for rehabilitation purposes.</p> <p>Stockpiles are within the required height restriction.</p>	<p>Compliant</p>

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<p>Topsoil must be deemed to be the top layer of soil containing organic material, nutrients and plant grass seed. For this reason it is an extremely valuable resource for the rehabilitation and vegetation of disturbed areas.</p> <p>At the beginning of the construction phase, topsoil removed for vegetation clearance must be stripped to a minimum depth of 300 mm and windrowed.</p> <p>All topsoil must be removed and stockpiled on the site.</p> <p>However, the use of topsoil for rehabilitation contaminated by the seed of alien vegetation must not be permitted unless a programme to germinate the seed and eradicate the seedlings is drawn up and approved, or some other mitigatory feature is found. This must be approved by the ECO.</p> <p>Single handling is recommended. Stockpiles must not be higher than 2m to avoid compaction.</p> <p>The soils surrounding the wingwalls and concrete aprons must be suitable loosened on completion of construction activities.</p> <p>Dust suppression is necessary for stockpiles older than a month – with either water or a biodegradable chemical binding agent.</p> <p>Backfill will require contouring to ensure that it blends in with the surrounding environment.</p>	<p>No dust was observed during the Audit Site Inspection.</p>	
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## **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. There are no shortcomings in the EMPr. There is therefore no need to amend the EMPr.

## **9 ASSUMPTION, UNCERTAINTIES/ GAPS IN KNOWLEDGE**

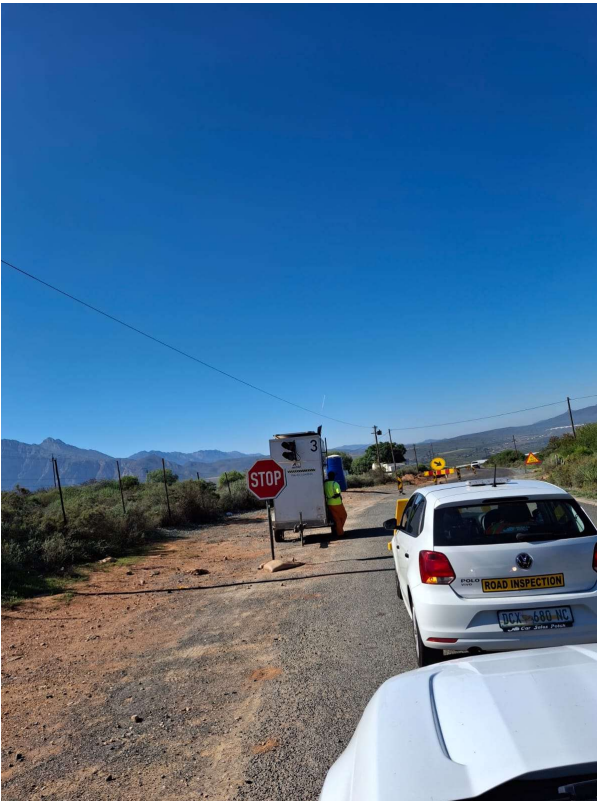
It is assumed that all information provided by the Site Manager and the appointed ECO, is correct and complete. The actions relating to past conduct of Contractors and/or other service providers is uncertain and can only be taken from information provided by the Site Manager, ECO Monitoring Reports and from personal observations made during the audit inspection of the site.

There are no significant uncertainties.

There are no significant gaps in knowledge.

## 10 PHOTOGRAPHIC RECORD

Photographs taken during Audit Site Inspection on 10 April 2026.



Stop and Go control system at the end of the relevant section of the DR1400.



Mobile toilet at the Stop and Go. Toilet needs to be secured to the ground



Road has now been tarred and stormwater drains are being completed. Minimal disturbance outside the site area was noted.

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Activities underway along this section of the stormwater channels.



Looking east towards on of the laydown areas. Minimal dust is seen from laydown area activities.



No drip tray beneath the generator.



Vegetation that was disturbed during the installation of the fence.



A large area adjacent to the new fence has been disturbed.



Areas of disturbance will need to be rehabilitated.

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Culvert beneath the road. Loose shade netting must be removed from site or secured.



Stockpiles within the laydown area.



Litter along the DR1400

Audit Report No. 2



More litter noted on site.



Mobile toilet at laydown area. Toilet needs to be secured to the ground. Loose plastic must be removed or secured.



Shade netting demarcating the no-go grave area.

Audit Report No. 2



Stormwater drains/channels complete towards the mind section of the road.



Access points provided to neighbouring farms with stormwater control in place.



Drip tray in place.



Drum provided for waste but surrounding area contains much litter.



Additional laydown area that should have a demarcated refuse area.



Waste is not within a demarcated area.

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Excess materials should be stored in a demarcated waste area.



Stockpiles of material that will likely be disposed at a landfill site. Note litter. The nearby watercourse must be clearly demarcated to ensure stockpiles do not encroach within 32m of the watercourse.



Shaded eating area. Drums adjacent to this area contain a black substance that should be labelled. No waste bins provided within this area.

Audit Report No. 2



Spill or leak that must be cleaned and removed appropriately.



Friday, 10 April 2026 · 10:58

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De Vlei Rd, South Africa

Site Inspection was conducted on 10 April 2026.

## 11 CONCLUSION

The current construction activities are mostly compliant with the EA and EMPr. However, the primary concern identified during the audit relates to waste management practices on site.

A dedicated waste storage area must be clearly demarcated within the laydown area, and all waste generated on site is to be stored within this designated area. Waste management practices must be improved to ensure proper segregation, handling, and disposal in accordance with applicable requirements.

All waste must be disposed of at suitably authorised facilities, and disposal documentation (waste manifests or disposal slips) must be provided to the Environmental Control Officer (ECO) as proof of compliant disposal.

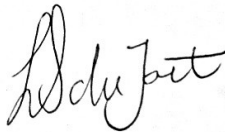
In addition, a comprehensive litter sweep of the site must be undertaken to remove any scattered waste. Additional bins should be strategically placed along sections of the road and within the laydown area to facilitate proper waste disposal and minimise littering.

## 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:

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Trading as Earth Grace Environmental Consultancy

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16 April 2026

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