

PACALTSDORP RESERVOIR AND WATER TOWER, ON THE REMAINDER OF ERF 325, GEORGE LOCAL MUNICIPALITY, WESTERN CAPE

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



Development Phase: Civil construction completed.

EIA Reference Number: 16/3/3/1/D2/44/0019/23

NEAS Reference: WCP/EIA/0001329/2023

Submitted: 19-01-2026

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DECLARATION OF INDEPENDENCE

I consider myself bound to the rules and ethics of the Environmental Assessment Practitioners Association of South Africa (EAPASA).

I act as an independent practitioner in this application.

I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the Applicant.

I declare that there are no circumstances that may compromise my objectivity in performing such work.

At the time of conducting the study and compiling this report I did not have any interest, hidden or otherwise, in the development that this study has reference to, except for financial compensation for work done in a professional capacity.

I do not have any influence over decisions made by the governing authorities.

I undertake to disclose all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by a competent authority to such a relevant authority and the applicant.

This document and all information contained herein is and will remain the intellectual property of Maretha Alant. This document, in its entirety or any portion thereof, may not be altered in any manner or form, for any purpose without the specific and written consent of the author.

All the particulars furnished by me in this document are true and correct.



Maretha Alant

EAPASA Registration Number 2022/5417

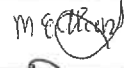
Qualifications: M.Phil. Environmental Science (University of Cape Town, 1996)

Working in the Integrated Environmental Management field for the past 29 years, Ms Alant had an opportunity to participate in a range of integrated environmental management, conservation planning and protected area expansion projects. Her recent focus (2024 to date) is external Environmental Audits and compliance monitoring as an Environmental Control Officer (ECO).

DOCUMENT CONTROL

REFERENCE	REVISION	DATE	AUTHOR
2026_1_PDWTW	V1	16 January 2026	Maretha Alant

APPROVAL FOR RELEASE

Name	Organisation	Signature
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Niel van der Westhuizen	Zutari (Pty) Ltd	
Stefan Delpont	Hilland Environmental (Pty) Ltd	

DISTRIBUTION

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I&APs	Refer to Appendix 5 for the list of I&APs	

Note: This Environmental Audit Report will be uploaded onto the Hilland Environmental website. All potential and registered interested and affected parties will be notified within 7 days of the date of submission to the competent authority.

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Appendix 1: Environmental Authorisation

Appendix 2: EMPr

Appendix 3: General Authorisation (Ref. No: WU36024)

Appendix 4: Auditor CV

Appendix 5: List of I&APs

CONTENT OF AN ENVIRONMENTAL AUDIT REPORT

This audit report is submitted in terms of Regulation 34 of GN R. 982 of the 2014 EIA Regulations as amended. Appendix 7 of Regulation 982 contains the required contents of an Environmental Audit Report. The checklist below serves as a summary of how these requirements were incorporated into this Audit Report.

(1) An Environmental audit report prepared in terms of these Regulations must contain -

Requirement	Description
Details of – The independent person who prepared the environmental audit report; and the expertise of the independent person that compiled the environmental audit report.	The report has been prepared by Maretha Alant, EAPASA Registration Number 2022/5417 Working in the Integrated Environmental Management field for the past 29 years, Ms Alant had an opportunity to participate in a range of integrated environmental management, conservation planning and protected area expansion projects. Her recent focus (2024 to date) is external Environmental Audits and compliance monitoring as the Environmental Control Officer (ECO). Appendix 4: Auditor CV.
A declaration that the auditor is independent.	As stated upfront in the report.
An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	This External Environmental Audit Report monitors compliance against: (1) the Environmental Authorisation (EA) conditions as granted on 7 March 2024 as it relates to the new Pacaltsdorp 3 megalitre reinforced concrete reservoir, new 300 kilolitre water supply pump station and associated infrastructure on Erf 325 (EA Ref. 16/3/3/1/D2/44/0019/23). (2) the approved EMPr and (3) reviewed the Environmental Monitoring Reports (1-18) prepared by Hilland Environmental.
A description of the methodology adopted in preparing the environmental audit report.	Refer to Section 2.1.
An indication of the ability of the EA and EMPr to – - Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; - Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and - Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	Refer to Sections 3 and 5. The conditions of the EA and EMPr were complied with. The ECOs, Hilland Environmental, Icon Construction and Zutari strived to avoid negative environmental impacts.
A description of any assumptions made, and any uncertainties or gaps in knowledge.	No known knowledge gaps. Refer to Section 1.1 for Assumptions and Limitations.

A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	This Environmental Audit Report will be uploaded onto the HilLand Environmental website. All potential and registered interested and affected parties will be notified within 7 days of the date of submission to the competent authority. Refer to Appendix 5 for list of I&APs.
A summary and copies of any comments that were received during any consultation process.	Not Applicable.
Any other information requested by the competent authority.	Not Applicable.

Table 1 Content of an Environmental Audit

1. INTRODUCTION

A Basic Assessment Report (BAR), inclusive of an Environmental Management Programme Report (EMPr) for the proposed Pacaltsdorp 3 megalitre reinforced concrete reservoir, new 300 kilolitre water supply pump station and associated infrastructure on Erf 325 was granted Environmental Authorisation (EA) on 07/03/2024 (EA Ref. 16/3/3/1/D2/44/0019/23). The BAR and EMPr were drafted by Zutari (Pty) Ltd. Icon Construction was the civil works contractor for the project.

Experienced Environmental Control Officers (ECOs) HilLand Environmental were appointed for compliance monitoring of the project (EA Condition 9) by Zutari (Pty) Ltd on behalf of the Municipal Manager, George Municipality (holder of the EA). HilLand Environmental drafted 18 Environmental Monitoring Reports.

Maretha Alant was appointed by Zutari (Pty) Ltd to undertake the External Environmental Audit (EA Condition 13, 14, 15 and 16) for the project. Condition 14.1 of the EA stipulates that the Environmental Audit Report must be submitted to the Competent Authority within three (3) months of conclusion of the construction phase and the rehabilitation thereof, but not later than 31 July 2032.

Civil works was completed on 27 October 2025 and Mechanical work will start in 2026.

Observations from Environmental Auditor site inspection on 12 December 2025:

- The stormwater outlet (gabion and reno-matresses) has been installed with minimal disturbance around the construction footprint.
- Construction of the 3 Ml reservoir, 300 kl water tower, pumpstation, generator room and connecting pipework have been completed.
- Some vegetation growth was noted on the pipeline route and rehabilitation is in progress.
- The site camp / office has been removed and the guard house is operational. There is currently not an environmental file on-site.
- The parking area has been established.
- A permanent fence (clear-vu) has been installed.
- All building rubble and excess construction materials have been removed from site.
- Shaping has been done.
- Indigenous grass seed mix (*Cynodon dactylon* and *Stenotaphrum secundatum*) have been planted within the fenced area and topsoil replaced and rehabilitation is in progress.
- There are still bare patches and some signs of soil erosion present on the site.
- Some alien vegetation was noted in the fenced area, at the gabion structure and on the pipeline route.
- Storm water management in the fenced area was satisfactory but needs to be monitored.

Key project timelines are as follows:

- 1 November 2023: BAR and EMPr prepared by ZUTARI submitted to DEADP.
- 7 March 2024 Environmental Authorisation (EA) was issued (EA Ref. 16/3/3/1/D2/44/0019/23).
- 8 March 2024. Notification of EA to I&APs was done as confirmed by the EAP.
- 10 April 2024. Notification of commencement and proof of compliance with conditions 5 and 9 were sent to the DEADP.
- 17 April 2024. Civil construction commenced.
- 19 April 2024: Environmental induction was done with all new staff on site.
- April and May 2024: Report period for Environmental Monitoring Report 1.

- June 2024: Report period for Environmental Monitoring Report 2.
- July 2024: Report period for Environmental Monitoring Report 3.
- August 2024: Report period for Environmental Monitoring Report 4.
- September 2024: Report period for Environmental Monitoring Report 5.
- October 2024: Report period for Environmental Monitoring Report 6.
- November 2024: Report period for Environmental Monitoring Report 7.
- December 2024: Report period for Environmental Monitoring Report 8.
- January 2025: Report period for Environmental Monitoring Report 9.
- February 2025: Report period for Environmental Monitoring Report 10.
- March 2025: Report period for Environmental Monitoring Report 11.
- April 2025: Report period for Environmental Monitoring Report 12.
- May 2025: Report period for Environmental Monitoring Report 13.
- June 2025: Report period for Environmental Monitoring Report 14.
- July 2025: Report period for Environmental Monitoring Report 15.
- August 2025: Report period for Environmental Monitoring Report 16.
- September 2025: Report period for Environmental Monitoring Report 17.
- 27 October 2025: ECO final site inspection (construction completion and rehabilitation).
- October 2025: Report period for Final Environmental Monitoring Report 18.
- 27 October 2025. Civil construction completed.
- 12 December 2025: External Environmental Auditor site visit.
- 19 January 2026: External Environmental Audit Report submitted to the Competent Authority.

1.1 Assumptions and Limitations

The following assumptions and limitations are provided:

- The information used to draw up this report is assumed to be factual, accurate and truthful;
- External reports used to consider impacts are taken at value; and
- It is assumed that the Holder of the EA and project team made available all information relating to the project and its management protocols.

1.2 Background Information

George Municipality proposed the development of a new water storage facility in support of existing infrastructure for Pacaltsdorp. The Environmental Authorisation (EA Ref. 16/3/3/1/D2/44/0019/23) was granted on 07/03/2024 for the following works:

Reservoir, Water Tower and pumpstation

- A 3 Mℓ reservoir with a 300mm ND inlet and outlet pipe.
- A 300kℓ water tower with a 300mm ND inlet and outlet pipe.
- A pumpstation with 300mm ND inlet and outlet pipe.

Pipework

- A 250mm ND uPVC will supply water to the reservoir/tower.
- A 315mm uPVC pipe will supply water from the water tower to connection at Mission/Hibiscus Street.

- A 315mm uPVC pipe will deliver water between the reservoir and pumpstation also, pump station to tower tank.
- A 315 mm uPVC pipe for tower overflow and reservoir to valve chamber pipes.
- A 200mm ND uPVC pipe is proposed for the reservoir scour.

Reno mattress

A 315mm uPVC pipe will transport stormwater to a proposed reno mattress to the north-west of the site where the stormwater will be released into a stream.

Activities Authorised

Government Notice No. 324 of 7 April 2017 (Listing Notice 3) Activity Numbers: 2 and 12.

Listed Activities	Activity/Project Description
Environmental Impact Assessment Regulations Listing Notice 3 (Government Notice No. 324 of 7 April 2017)	
Activity Number: 2 Activity Description: The development of reservoirs excluding dams with a capacity of more than 250 cubic metres. i. Western Cape i. A protected area identified in terms of NEMPAA, excluding conservancies; ii. In areas containing indigenous vegetation; or iii. Inside urban areas; (aa) Areas zoned for use as public open space; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority or zoned for a conservation purpose.	The reservoir capacity will be approximately 3300m ³ and the proposed area does contain Indigenous vegetation.
Activity Number: 12 Activity Description: The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape (i). Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; (ii). Within critical biodiversity areas identified in bioregional plans; (iii). Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line or even in urban areas; (iv). On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or (v). On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the	The site falls within the Garden Route Granite Fynbos vegetation type which has an ecosystem threat status of critically endangered according to the 2022 Revised List of Ecosystems.
prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	

General Authorisation (Ref. No: WU36024)

An Aquatic Biodiversity Impact Assessment (dated July 2023) and updated in August 2023 to include the addition of an outflow pipe for stormwater, reservoir scour and emergency overflow events, was drafted by Dr. Jackie Dabrowski of Confluent Environmental (Pty) Ltd.

An application was made for the registration of water use in terms of section 39 of the National Water Act, no 36 of 1998 for the proposed re-alignment of an existing sewer pipeline, construction of reservoir, water tower and pipelines for bulk water supply adjacent to wetlands located on Portion 0 of Erf 325 (REM) within quaternary catchment K30C of the Breede-Olifants Water Management Area, George Local Municipality.

The Department of Water and Sanitation confirmed the General Authorisation (Ref. No: WU36024) on 25 April 2024.

ANNEXURE 1: LOCALITY MAP

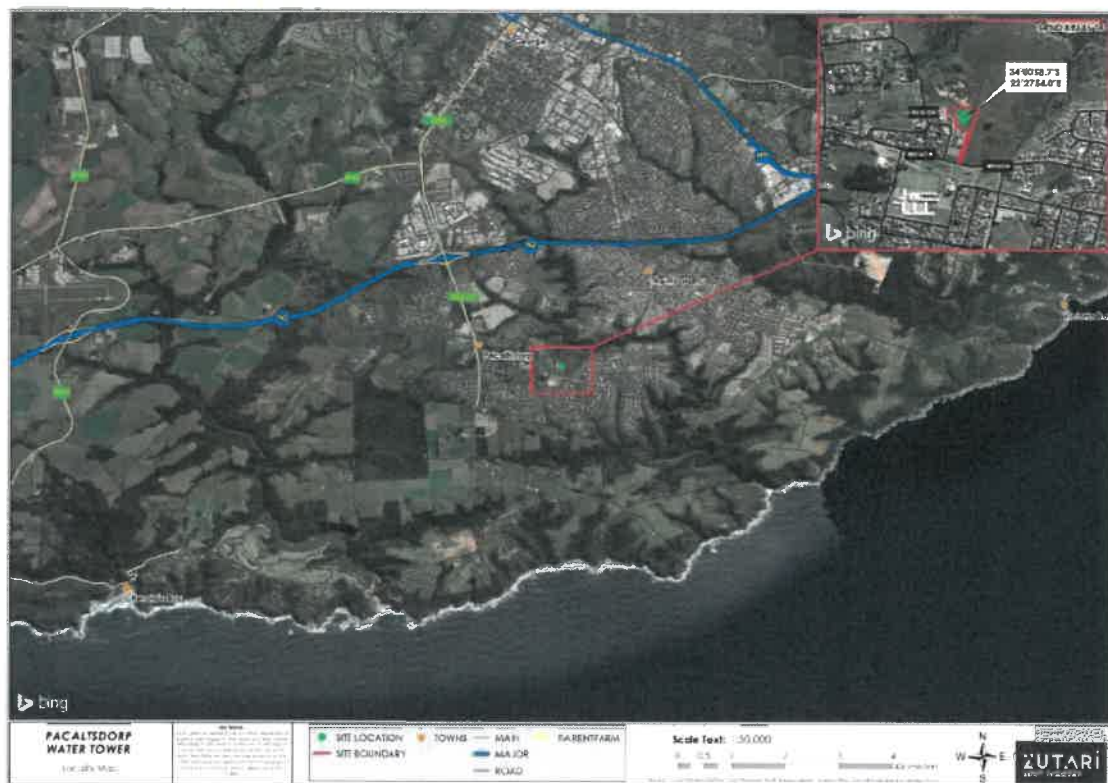


Figure 1. Locality Map (extract from EA)

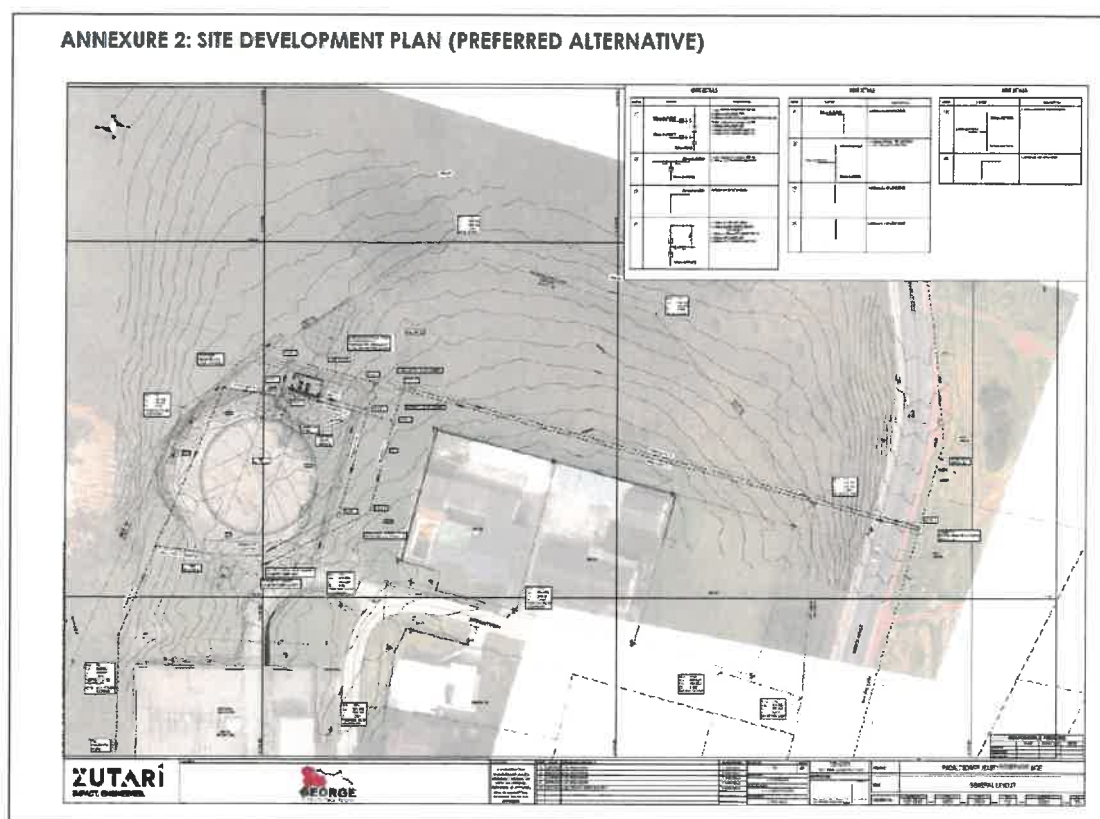


Figure 2. Site Development Plan (extract from EA)

2 REPORTING REQUIREMENTS

2.1 Methodology

This external Environmental Audit Report was undertaken by considering the conditions of the EA and the EMPr prepared by Zutari and the (17) Environmental Monitoring Reports and the Final Environmental Monitoring Report prepared by HilLand Environmental and evaluated whether or not the holder of the EA complied with the requirements.

Full compliance is highlighted in green, partially-complaint is highlighted in orange, non-compliant is highlighted in red and not applicable / cannot be assessed is highlighted in yellow.

Compliant	Fully compliant with condition.
Partially-compliant	Indicates a partial compliance with reasons therefore.
Non-compliant	Does not comply and requires urgent attention.
Not Applicable / Cannot be assessed	Condition does not apply or cannot be complied with as the action has not yet taken place or cannot be assessed as it took place in the past.

2.2 Consultation Process

As per Section 34(6) of the 2014 EIA Regulations, as amended, and the EA Condition 16 a public consultation process is required for an Environmental Audit Report. Section 34(6) states that within 7 days of the date of submission of an environmental audit report to the Competent Authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available—

- (a) to anyone on request; and
- (b) on a publicly accessible website, where the holder has such a website.

This Environmental Audit Report will be uploaded onto the HilLand Environmental website and all potential and registered interested and affected parties will be notified within 7 days of the date of submission to the Competent Authority.

3 ENVIRONMENTAL COMPLIANCE EVALUATION

3.1 Environmental Authorisation

Conditions have been categorized according to their grouping in the EA. There are 34 applicable conditions within these categories, as follows:

Category	Number of conditions
E. Conditions of Authorisation	
Scope and Validity period of authorisation	4
Notification and administration of appeal	1
Written notice to the Competent Authority	1
Management of activity	2
Monitoring	4
Auditing	4
Specific Conditions	3
General Matters	5
Compliance with Environmental Authorisation and EMPr	5
F. Appeals	5

No	Condition of Authorisation	Final Environmental Monitoring Report (no 18) findings	Compliance Rating	Auditor Comment
	Scope and Validity Period of authorisation			
1.	This Environmental Authorisation is granted for the period of eight (8) years from the date of issue until 28 February 2032 , the date on which all the listed activities, including post construction rehabilitation and monitoring requirements, will be deemed to be concluded at the site.	EA is valid for 8 years until 28 February 2032 – construction and post construction rehabilitation monitoring must be completed by this date.	Compliant	Civil construction was completed 27 October 2025. Mechanical work to commence in 2026. Rehabilitation in progress. Project well within time frame.

	Failing which, this Environmental Authorisation shall lapse, unless the environmental authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).			
2.	The Holder is authorised to undertake the listed activities specified in Section B above in accordance with the Preferred Alternative described in the FBAR dated 02 November 2023 on the site described in Section C above.	A 3 Mℓ reservoir with a 300mm ND inlet and outlet pipe - Done. A 300kℓ water tower with a 300mm ND inlet and outlet pipe - Done. A pumpstation with 300mm ND inlet and outlet pipe. - Done <u>Pipework</u> A 250mm ND uPVC will supply water to the reservoir/tower - Done. A 315mm uPVC pipe will supply water from the water tower to connection at Mission/Hibiscus Street - Done. A 315mm uPVC pipe will deliver water between the reservoir and pumpstation also, pump station to tower tank - Done. A 315 mm uPVC pipe for tower overflow and reservoir to valve chamber pipes - Done. A 200mm ND uPVC pipe is proposed for the reservoir scour - Done. A 315mm uPVC pipe will transport stormwater to a proposed reno mattress to the north-west of the site where the stormwater will be released into a stream - Done.	Compliant	Civil construction was completed 27 October 2025 and rehabilitation is in progress. Mechanical work will start in 2026.

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	The Municipal Manager % The Director: Civil Engineering Services remains responsible for compliance with the EA.	Compliant	Based on the review of the EA, EMPr and 18 Environmental Monitoring Reports drafted by HillLand Environmental and on-site discussions with Niel van der Westhuizen of Zutari at the auditor site visit on 12 December 2025 the project is compliant. Refer to Sections 3 and 5 for details.
4.	Any changes to, or deviations from the scope of the preferred 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.	Any changes to the approved SDP and as described in section B of the EA MUST be approved by DEADP before it may be implemented.	Compliant	No changes or deviations were necessary based on discussions with Zutari and HillLand Environmental.
	Notification and administration of appeal			
5.	The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision 5.1 – notify all registered Interested and Affected Parties (“I&APs”) of – 5.1.1 the decision reached on the application; 5.1.2. the reasons for the decision as included in Annexure 3; 5.1.3. the date of the decision; and 5.1.4. the date when the decision was issued. 5.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal	Notification of EA to I&APs was done as confirmed by the EAP – 8 March 2024.	Compliant	Based on feedback provided by HillLand Environmental, No appeals were lodged.

	Regulations, 2014 (as amended) detailed in Section G below; 5.3. draw the attention of all registered I&APs to the manner in which they may access the decision; 5.4. provide the registered I&APs with the: 5.4.1. name of the Holder (entity) of this Environmental Authorisation, 5.4.2. name of the responsible person for this Environmental Authorisation, 5.4.3. postal address of the Holder, 5.4.4. telephonic and fax details of the Holder, 5.4.5. e-mail address, if any, of the Holder, 5.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended). 5.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision. 5.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided (i.e. the listed activities, including site preparation, must not commence until the appeal is decided).			
	Written notice to the Competent Authority			
6.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities.	Notification of commencement and proof of compliance with conditions 5 and 9 were sent to the DEADP on 10 April 2024.	Complaint	Based on feedback provided by HilLand Environmental.

6.1	The notice must make clear reference to the site details and EIA Reference number given above.	Same as above.	Compliant	Based on feedback provided by HillLand Environmental.
6.2	The notice must also include proof of compliance with the following conditions described herein: Conditions: 5 and 9	Same as above.	Compliant	Based on feedback provided by HillLand Environmental.
Management of activity				
7.	The Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is herewith approved in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended).	Draft EMPr is approved and must be implemented.	Compliant	The EMPr was satisfactorily implemented based on review of the EMPr and 18 Environmental Monitoring Reports prepared by HillLand Environmental, and on-site discussions with Niel van der Westhuizen of Zutari at the auditor site visit on 12 December 2025.
8.	The EMPr must be included in all contract documentation for all phases of the development.	The EMPr must be included in the contract document – construction phase	Compliant	Based on feedback provided by HillLand Environmental.
Monitoring				
9.	The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), prior to commencement of any works (i.e., removal and movement of soil) and for the duration of the construction and rehabilitation phases.	HillLand Environmental is the appointed ECO for the current construction phase – proof of compliance was included in the notification of commencement letter dated 10 April 2024 .	Compliant	HillLand Environmental was appointed as the ECO for the project.
10.	The ECO must– 10.1. be appointed prior to commencement of any works (i.e. removal and movement of soil); 10.2. ensure compliance with the EMPr and the provisions contained herein; 10.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO; 10.4. remain employed until all development activities are concluded, and the post development implementation,	10.1 Comply 10.2 Ongoing for the current construction phase. 10.3 Ongoing for the current construction phase 10.4 ECO must monitor compliance until all development activities are complete including the post construction rehabilitation and monitoring - done .	Compliant	10.1 HillLand Environmental was appointed 10.2. Environmental Monitoring Reports no 1 – 18 were drafted and project was compliant. 10.3. Based on feedback provided by HillLand Environmental. 10.4 Rehabilitation is in still in progress. Follow up alien clearing is required and monitoring for

	rehabilitation and monitoring requirements are finalised.			erosion should take place to ensure corrective action is taken if required.
11.	A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and be made available to anyone on request, and where the Holder has website, such documents must be made available on such publicly accessible website.	The EMPr, EA, GA and ECO monitoring reports must be kept in the environmental file.	Compliant	Based on feedback provided by Hilland Environmental there was an environmental file on site during construction. There is currently not an environmental file on site. It is recommended that the EA and a notice with a QR (Quick Response) code regarding the availability of the environmental file is displayed at the guard house/ security office until the facility becomes operational.
12.	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.	Department of Environmental Affairs officials may visit the site at any time.	Not Applicable	There is no record of Competent Authority officials that visited the site in the documentation reviewed.
Auditing				
13.	The Holder must, for the period during which the environmental authorisation and EMPr remain valid, ensure that compliance with the conditions of the environmental authorisation and the EMPr is audited.	External environmental audit will be required at the end of construction, to be submitted within 3 months of conclusion of the construction AND rehabilitation phase, but not later than 31 July 2032.	Compliant	This external Environmental Audit Report will be submitted to the Competent Authority on 19 January 2026, within three (3) months of conclusion of the construction phase, but not later than 31 July 2032. Civil construction was completed on 27 October 2025 and rehabilitation is in progress. Mechanical work will start in

				2026. Project is well within timeframe.
14.	The frequency of auditing compliance with the conditions of the environmental authorisation and provisions of the EMPr, must adhere to the following programme:	External environmental audit will be required at the end of construction, to be submitted within 3 months of conclusion of the construction AND rehabilitation phase, but not later than 31 July 2032.	Compliant	See above.
14.1	Submit an environmental audit report to the Competent Authority within three (3) months of conclusion of the construction phase and rehabilitation thereof, but not later than 31 July 2032		Compliant	See above.
15.	The Environmental Audit Report(s), must –	The external auditor will have to comply with Condition 15. Note that the EAP or ECO cannot conduct the external environmental audit.		See below.
15.1	Be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process;		Compliant	Maretha Alant (EAPASA Registration Number 2022/5417) was appointed by Zutari (Pty) Ltd to undertake the External Environmental Audit. Expertise: >29 years of experience in Integrated Environmental Management, in various private and public sectors. Refer to Appendix 4: Auditor CV.
15.2	Provide verifiable findings, in a structured and systematic manner, on– 15.2.1.the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 15.2.2.the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of	Noted.	Compliant	Refer to Sections 3 and 5 of this Audit Report.

	environmental impacts associated with the undertaking of the activity.			
15.3	Identify and assess any new impacts and risks as a result of undertaking the activity;		Compliant	No new impacts or risks were identified.
15.4	Evaluate the effectiveness of the EMPr.		Compliant	The EMPr was effective. Refer to Sections 3 and 5 of this Audit Report.
15.5	Identify shortcomings in the EMPr;		Compliant	No shortcomings were identified regarding the construction phase. Mitigation measures relating to the interim phase, post-civil construction and before site handover, could have been better articulated regarding rehabilitation, alien clearing and monitoring for signs of erosion.
15.6	Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;		Compliant	See above.
15.7	Indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;		Compliant	Civil construction commenced on 17 April 2024 and was completed on 27 October 2025. Rehabilitation is in progress. Mechanical work will start in 2026.
15.8	Include a photographic record of the site applicable to the audit;		Compliant	Refer to Section 4 of this Audit Report.
15.9	Be informed by the ECO reports		Compliant	18 Environmental Monitoring Reports were reviewed. Refer to Section 3.3 of this Report.
16.	The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly		Compliant	The Audit Report will be available on the Hilland Environmental website and I&APs will be notified within 7 days.

	accessible website (if applicable).			
	Specific Conditions			
17.	The Stormwater Management Plan compiled and included in the EMPr must be adhered to during the construction phase as stipulated.	Stormwater management plan in the EMPr must be adhered to.	Compliant	Stormwater management was addressed at the site visits and in the in the Environmental Monitoring Reports satisfactorily. Extreme rain events were managed professionally and stormwater management was on the agenda at all the site meetings.
18.	All areas to be cleared must be clearly demarcated before any clearing of vegetation commences.		Compliant	The Environmental Monitoring Reports addressed demarcation satisfactorily.
19.	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority. Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or	General note – no heritage resources were uncovered during the construction phase.	Compliant	No heritage remains were exposed and no reporting required based on feedback from HilLand Environmental.

	graves or unmarked human burials including grave goods and/or associated burial material.			
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General Matters

No	Condition of Authorisation	Auditor Comment
1.	Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.	The Department of Water and Sanitation confirmed the General Authorisation (Ref. No: WU36024) on 25 April 2024 for the proposed re-alignment of an existing sewer pipeline, construction of reservoir, water tower and pipelines for bulk water supply adjacent to wetlands located on Portion 0 of Erf 325 (REM) within quaternary catchment K30C of the Breede-Olifants Water Management Area, George Local Municipality.
	Amendment of Environmental Authorisation and EMPr	
2.	If the Holder does not start with all listed activities and exceed the threshold of each listed activity within the period referred to in Section G, this Environmental Authorisation shall lapse for that activity, and a new application for Environmental Authorisation must be submitted to the relevant Competent Authority. If the Holder wishes to extend a validity period specified in the Environmental Authorisation, an application for amendment in this regard must be made to the relevant Competent Authority prior to the expiry date of such a period.	Civil construction completed.
3.	The Holder is required to notify the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. In assessing whether to amend or correct the EA, 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. The onus is on the Holder to verify whether such changes to the environmental authorisation must be approved in writing by the relevant competent authority prior to the implementation thereof.	No amendments or changes were required based on feedback received.
4.	The manner and frequency for updating the EMPr is as follows: (a) Any further amendments to the EMPr, other than those mentioned above, must be approved in writing by the relevant competent authority. (b) An application for amendment to the EMPr must be submitted to the Competent Authority if any	No amendments or changes were required based on feedback received for Hilland Environmental.

	amendments are to be made to the impact management outcomes of the EMPr. Such amendment(s) may only be implemented once the amended EMPr has been approved by the competent authority. The onus is however on the Holder to confirm the legislative process requirements for the above scenarios at that time.	
5.	Where an amendment to the impact management outcomes of an EMPr is required before an environmental audit is required in terms of the environmental authorisation, an EMPr may be amended on application by the Holder of the environmental authorisation.	No amendments or changes were required.
	Compliance with Environmental Authorisation and EMPr	
6.	Non-compliance with a condition of this environmental authorisation or provisions of the EMPr is an offence in terms of Section 49A(1)(c) of the National Environmental Management Act, 1998 (Act no. 107 of 1998, as amended).	EA conditions and EMPr was implemented satisfactorily and is compliant.
7.	This Environmental Authorisation is granted for a set period from date of issue, during which period all the listed activities must be commenced with and concluded, including the post-development rehabilitation; monitoring requirements and environmental auditing requirements which must be concluded.	Project well within timeframe.
8.	This Environmental Authorisation is subject to compliance with all the suspensive conditions (i.e. 6 & 10, stipulated under Section E of this EA). Failure to comply with all the suspensive conditions, prior to the physical implementation of the activities (including site preparation) will render the entire EA null and void. Such physical activities shall be regarded to fall outside the scope of the Environmental Authorisation and shall be viewed as an offence in terms of Section 49A(1)(a) of NEMA.	Project is compliant.
9.	In the event that the Environmental Authorisation should lapse, it is an offence in terms of Section 49A(1)(a) of NEMA for a person to commence with a listed activity, unless the competent authority has granted an Environmental Authorisation for the undertaking of the activity.	Project well within timeframe.
10.	Offences in terms of the NEMA and the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution.	Project is compliant.

F. Appeals

No	Condition of Authorisation	Compliance Rating	Auditor Comment
1.	An appellant (if the holder of the decision) must, within 20 (twenty) calendar days from the date the	Not Applicable	No appeals were lodged.

	notification of the decision was sent to the holder by the Competent Authority –		
1.1	Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations 2014 (as amended) to the Appeal Administrator; and	Not Applicable	
1.2	Submit a copy of the appeal to any registered I&APs including any Organ of State with interest in the matter; and	Not Applicable	
1.3	Submit a copy of the appeal to the decision-maker (i.e. the Competent Authority that issued the decision)	Not Applicable	
2.	An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered I&APs–	Not Applicable	
3.	The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered I&AP and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.	Not Applicable	
4.	The appeal and the responding statement must be submitted to the Appeal Administrator at the address listed below:	Not Applicable	

3.2 Environmental Management Programme

The approved EMPr (Ref:1002814 – 2023/11/01) was developed by Zutari. As per comment from DEADP, the aquatic specialist has made a recommendation of a stormwater outlet structure (reno mattress) to accommodate the site's stormwater and the possibility of an overflow event.

Hilland Environmental was appointed as the ECO. The 18 Environmental Monitoring Reports (refer to Section 3.3) addressed compliance with the EMPr and EA Conditions.

The EMPr addresses the following project stages:

- Pre-construction Phase (Section 6.1)
- Construction Phase (Section 6.2)
- Operational Phase (Section 6.3)

Section 6.1 and 6.2 of the EMPr is relevant to this environmental audit. Some impact management actions have already taken place and was reported on in the Environmental Monitoring Reports. However, the Environmental Auditor cannot confirm that it was compliant as the development phase has been completed. A rating of "cannot be assessed" was given in these instances.

6.1 Pre-construction phase

Mitigation measures (impact management actions)	Environmental Auditor comment	Compliance rating
Aquatic Ecology		
A stormwater management plan must be developed in the preconstruction phase, detailing the stormwater	Mitigation measure to manage stormwater was implemented and	Compliant

structures and management interventions that must be installed to manage the increase of surface water flows directly into any natural systems.	reported on in the Environmental Monitoring Reports.	
Pre-construction temporary fencing must be erected around the artificial wetland with a 5m buffer from the edge.	Environmental Monitoring Reports mentioned temporary fencing.	Compliant
Signage indicating the artificial wetland as a No-go area must be placed on the fencing.	Environmental Monitoring Reports mentioned signage.	Compliant
All workers and contractors must be briefed that adjacent wetlands and buffer areas are no-go zones.	Environmental Monitoring Reports mentioned no-go areas / buffer zones / areas.	Compliant
Compliance and auditing		
Appoint a suitably qualified independent ECO. This person should have appropriate experience of environmental management, and a good understanding of local fauna and flora. The ECO should be made aware of the potential occurrence of scientifically important fossil remains within the development footprint. The ECO should be able to make clear recommendations with regard to the management of disturbed areas.	Hilland Environmental was appointed the ECO for the construction phase. Management of disturbed areas was addressed satisfactory.	Compliant
Make provision for environmental auditing to assess the effectiveness of monitoring and management arrangements. The audit inspection should occur when the project has reached 80% completion, so that the contractor would still be available to implement any additional actions should there be any. The audit report should be submitted to the client, engineer, ECO and competent authority.	This external Environmental Audit Report covers this requirement adequately. Rehabilitation is in progress.	Compliant
Method statements		
- Method Statements must be submitted and approved prior to site establishment commencing. - The content and required actions of the Method Statements must be communicated to site staff through the compulsory induction training. - Refer to Section 5.5 of EMPr for the list of Method Statements required.	The Environmental Auditor did not get copies of the Method Statements from the pre-construction phase.	Cannot be assessed
Monitoring method and frequency		
Prior to the start of the construction period, the appointed ECO should confirm that the above-mentioned measures have been considered, and where possible implemented.	See above.	Cannot be assessed
The ECO shall undertake a pre-construction site visit and compile a report with photographic record of the condition of vegetation, watercourses and existing impacts within the construction footprint. This will be considered as the baseline for the project.	Environmental Monitoring Reports April and May 2024	Compliant
An approved construction footprint will be issued by the Engineer as a formal drawing. The Contractor shall	No revision of construction footprint required.	Compliant

request a formal revision of the drawing should a larger working/ construction area be required. The revision may only be issued subject to consultation with and written agreement from the ECO. The contract documentation shall make allowance for penalties in the case of negligence by the Contractor to comply with the requirements of the EMPr and to remain within the approved construction footprint.		
Should a plant search and rescue be required, the ECO or appointed sub-contractor shall record the types of species collected as well as the number of specimens collected, the habitat they were removed from and their general condition.	No plant search and rescue necessary. Previously disturbed area.	Compliant
Where required, a Plant Rescue and Protection Plan should be submitted to the ECO for approval.	No plant rescue required. Previously disturbed area.	Compliant
Code of conduct		
- The Contractor must develop a project specific Code of Conduct in consultation with representatives from the applicant. The code should identify which types of behaviour and activities are not acceptable. Construction workers in breach of the code should be dismissed or subject to strict disciplinary action. All dismissals must comply with the South African labour legislation. - The Code of Conduct must be signed by the proponent and contractor before contractors move onto site. - The Code of Conduct, shall as a minimum include the following considerations: - No workers are permitted to trespass onto adjacent properties. - Waste management measures must be followed (detailed in Management of Construction Camp. Any employee found to be littering either on site, or whilst being transported to and from site should be fined. - All vehicles must be road-worthy, and drivers must be qualified and licensed. The drivers must be made aware of the potential road safety issues and the need for strict speed limits. Contractors appointed by the proponent must ensure that all workers are informed at the outset of the construction phase of the conditions contained in the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.	No evidence provided regarding the Code of Conduct.	Cannot be assessed
Training and awareness		
Preconstruction environmental induction for all construction staff on site must be undertaken to ensure that basic environmental principles are adhered to. This includes awareness of harm	Environmental induction and toolbox talks took place and basic firefighting equipment was on site.	Compliant

caused by littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas etc. • Appropriate emergency training (e.g. firefighting) must be given to team prior to the construction period. • The need to implement a training and skills development programme for local workers should be investigated prior to the initiation of the construction phase. The aim of the programme would be to maximise local employment opportunities. • Ensure that noise as a component is included in the induction of employees and contractors, and how their activities and actions can impact on residents in the area (reverse alarms and reversing close to dwellings, driving fast past residential dwellings at night, maintenance of equipment). All contractors and employees should receive this induction. • The Contractor must provide appropriate fire-fighting equipment on site and ensure that selected construction staff are appropriately trained for fighting fires.		
Monitoring		
Prior to the start of the construction period, the appointed ECO should confirm that the above-mentioned measures have been considered, and where possible implemented.	No evidence provided.	Cannot be assessed
The details of the Monitoring Forum (if applicable) and Code of Conduct must be made available to the ECO, and a copy must be kept on site for the duration of the construction phase.	No evidence provided.	Cannot be assessed
All relevant Method Statements should be provided to the ECO for review and approval prior to construction commencing.	No evidence provided.	Cannot be assessed

Section 6.2 of the EMPr addressed the Construction Phase.

6.2 Construction Phase

Mitigation measures (impact management actions)	Environmental Auditor comment	Compliance rating
Aquatic		
The site office should have a store of materials suitable for rapid response erosion control such as shade-cloth (silt fencing), haybales (check-dams), wooden droppers, hessian fabric, and fencing wire.	No evidence provided.	Cannot be assessed
When construction commences in the site the reservoir area, create a compacted, low soil berm along the perimeter of the site approximately	The soil berm was mentioned in the Environmental Monitoring Reports.	Compliant

400mm high to retain stormwater on site and reduce runoff.		
Monitor the site during/ following periods of rainfall and install haybale check dams as the points where runoff collects and could overtop/breach the soil berm.	Stormwater mitigation measures were mentioned in the Environmental Monitoring Reports but unsure exactly what was implemented.	Cannot be assessed
Check ahead for rainfall. Do not continue work during rainfall, and ensure the site is prepared to minimise erosion and sediment laden runoff in advance of rainfall.	No evidence provided.	Cannot be assessed
- Following rainfall, water pumped out of pools in excavated areas must not be directed to wetlands. - The soil berm system or temporary haybale check dam can be constructed to contain water until it seeps into the ground or slowly disperses through haybales which act as a filter.	No evidence provided.	Cannot be assessed
No sediment laden water must be allowed to run off the site into the artificial wetland or the north-west wetland.	Stormwater management was mentioned in the Environmental Monitoring Reports but unsure exactly what occurred on site.	Cannot be assessed
Construction of a 315mm pipeline and reno mattress to the north-west of the site where the stormwater will be released into a stream.	Construction completed.	Compliant
- The acceptable project area of influence (PAOI) is 2m disturbance along one side of the pipeline trench and 2m around the perimeter of the reno mattress. - The PAOI should be marked out with temporary fencing for the duration of the construction phase and all workers informed that no vehicle, materials or equipment may encroach beyond this.	A 2m PAOI was not specifically mentioned in the Environmental Control Reports.	Cannot be assessed
Any excavated topsoil must be replaced and graded to the surrounding contours. Exposed soil must be seeded with <i>Cynodon dactylon</i> and <i>stentaphrum secundatum</i>) at conclusion of construction.	Planting of indigenous seed (<i>Cynodon dactylon</i> and <i>stentaphrum secundatum</i>) took place.	Compliant
No construction materials, topsoil or waste may be discarded on the site. All materials must be removed post-construction.	All materials and waste have been removed of site.	Compliant
All mobile material stores should be kept on flat areas and bunded to prevent material loss during rainfall.	No evidence provided.	Cannot be assessed
Heritage (including Archaeology)		
Should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.	No Heritage Resources were found.	Compliant
General		
Vegetation clearing and topsoil		

• Cleared vegetation may not be disposed of as waste at a landfill site. • Vegetation clearing should occur in a phased manner in accordance with the construction programme to minimise impacts when rainfall does occur. • Where possible, a low cover of vegetation should remain within the construction footprint to bind the soil, prevent erosion and promote post-disturbance recovery of an indigenous ground cover. • To facilitate revegetation of denuded areas, topsoil should be stockpiled with seedbanks intact as far as possible, for use in the rehabilitation phase. • Disturbance of vegetation and topsoil must be kept to a practical minimum. • Strip and stockpile topsoil from all areas where soil will be disturbed below surface.	Topsoil management was mentioned in Environmental Monitoring Reports.	Compliant
Site Establishment		
The contractor must submit a Method Statement indicating the exact location, extent and construction details of the construction camp, and the impact mitigation measures the contractor proposes to put in place to the ECO for approval.	No method statement was submitted; however, the position of the site camp was discussed with the ECO – existing transformed area.	Compliant
The contractor shall establish the construction camp on site in a manner that does not adversely affect the environment.	The site camp was located on a transformed area (kikuyu grass).	Compliant
The construction footprint area must be limited to the minimum that is necessary.	Mentioned in Environmental Monitoring Reports.	Compliant
Dust management		
Appropriate dust suppression measures shall be used when dust generation is unavoidable, e.g., dampening with non-potable water, particularly during prolonged periods of dry weather in summer. Such measures shall also include the use of temporary stabilising measures e.g., chemical soil binders, straw, brush packs, chipping, etc	Dust management was compliant in Environmental Monitoring Reports but ensure what happened on site.	Cannot be assessed
As far as possible, stockpile dust generating materials away from areas where dust will be a nuisance or hazard.	Dust management was compliant in Environmental Monitoring Reports but ensure what happened on site.	Cannot be assessed
A method statement regarding dust management is required i.e., the contractor is required to indicate in a method statement how dust emissions will be minimised prior to any site clearing / excavation activities.	No evidence provided.	Cannot be assessed
Ablution facilities		
• Appropriate ablution facilities must be provided for construction workers during construction in accordance with the Occupational Health and Safety Act (Act 85 of 1998) (OHS). • The Contractor may not allow temporary toilets to be erected within 100m of watercourses or	The ablution facility was linked to the municipal infrastructure.	Compliant

wetland areas, unless agreed otherwise with the ECO. • Toilets shall be secured to the ground. • The Contractor shall ensure that all chemical toilets are cleaned and emptied regularly, especially prior to any temporary site closure or long weekend. • Proof of disposal of portable toilet content at a wastewater treatment works must be retained on site.		
Waste management		
Potential sources of waste pollution must be used responsibly and strictly managed on site. An integrated waste management approach in accordance with the Waste Management Hierarchy must be implemented on site. This should aim to avoid, reduce, reuse, recycle, recover and treat waste where possible, where disposal is the last resort.	Waste management was mentioned in Environmental Monitoring Reports but unsure what happened on site.	Cannot be assessed
Spoil management		
Any subsurface spoils from excavation must be disposed of where they will not bury the topsoil of agricultural land. Any additional overburden must be respread below the topsoil layer, and not mixed with it.	Excavated materials (subsoil) have been spoiled at a nearby sports field where it will have no negative impacts on topsoil (or any natural environment).	Compliant
Revegetation		
• This revegetation shall preferably occur incrementally immediately upon completion of the construction activities at the subject location. Should the revegetation of certain areas be done at a later stage due to finalisation of landscaping design and considerations, care should be taken to prevent soil erosion and windblown dust from exposed areas. • The Contractor may not use herbicides, pesticides, fertilisers or other poisonous substances for the rehabilitation process, unless approved by the ECO. • All rehabilitated areas shall be considered no-go areas and the Contractor shall ensure that none of his staff or equipment enters these areas.	Rehabilitation started and was mentioned in Environmental Monitoring Reports. Additional work may be required to remain compliant.	Compliant
Erosion and sedimentation		
• Erosion channels formed during the construction phase must be backfilled and consolidated and the areas must be restored to a proper stable condition. • No excavated holes or trenches should be left open for extended periods as fauna may fall in and become trapped. • Any stormwater within the site must be handled in a suitable manner, i.e. trap sediments, and reduce flow velocities where appropriate. • Flows should thus be allowed to dissipate over a broad area covered by natural vegetation.	Erosion management was mentioned in Environmental Monitoring Reports. Additional work may be required to remain compliant.	Compliant

The Contractor shall undertake reasonable measures to prevent soil erosion of the rehabilitated areas.		
Alien plant management		
All alien plant re-growth, which is currently limited within the greater region must be monitored and should it occur, these plants should be eradicated	Alien clearing took place during the construction phase. However, follow up is required to remain complaint. Some alien vegetation was present at the auditor site visit on 12 December 2025.	Compliant
Community relations		
The Contractor shall recognise that the site is visible to the public. As such, the construction camp shall be kept neat and clean at all times. Site equipment and materials will be kept away from other property entrances.	The construction camp has been removed.	Cannot be assessed
The Contractor shall erect signage on the site that provides the contact details of person(s) that the public can contact in case of complaints or incidents.	No signage currently present on site.	Cannot be assessed

3.3 Environmental Monitoring Reports

The external Environmental Auditor reviewed the Environmental Monitoring Reports (no 1 to 17) and the Final Environmental Monitoring Report (no 18).

Summary of Environmental Monitoring Reports prepared by Hilland Environmental

No	Dates	ECO Conclusion and Recommendations	Cover of Environmental Monitoring Reports
1.	April and May 2024	The construction site camp is set up on the southern edge of the site but will be shifted as soon as the contractor needs to start installing the 315mm water pipe (underneath the current site camp). No-go demarcation of the artificial wetland to the east of the pump station has been installed. Bulk earthworks of the reservoir and water tower have started and are ongoing. The topsoil is being stripped from the areas that will be disturbed and is stockpiled off site due to limited space on-site. The subsoil is also being stripped and stockpiled off site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	

2.	June 2024	Stormwater and erosion mitigation from the heavy rain during this reporting period was appropriately managed and no issues/ damage was noted during the ECO site inspection. The temporary fence is being installed. No-go demarcation of the artificial wetland and the excavations are up. Bulk earthworks of the reservoir are ongoing and water tower construction has started. The topsoil is being stripped from the areas that will be disturbed and is stockpiled off site due to limited space on-site. The subsoil is also being stripped and spoiled off site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	Environmental Monitoring Report No. 2 FOI Reservoir and Water Tower on Portion 972 of E1 325, Pacaltsdorp, George Local Municipality, Western Cape  Compiled by: Midland Environmental Reference: OE024/1317/04 Report Period: June 2024
3.	July 2024	The temporary construction site fence has been installed. No-go demarcation of the artificial wetland was stolen and will be replaced once the permanent fence is installed. The bulk excavation demarcation is in place. Layer works for the reservoir is ongoing and the water tower construction is ongoing – no environmental issues noted in terms of concrete works. The topsoil was stripped from the areas that will be disturbed and is stockpiled off site due to limited space on-site. The subsoil is also being stripped and spoiled off site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	Environmental Monitoring Report No. 3 FOI Reservoir and Water Tower on Portion of E1 of E1 325, Pacaltsdorp, George Local Municipality, Western Cape  Compiled by: Midland Environmental Reference: OE024/1317/06 Report Period: July 2024
4.	August 2024	The temporary construction site fence is in place. No-go demarcation of the artificial wetland has been stolen and will be replaced for the installation of the permanent fence. Layer works for the reservoir is ongoing and the water tower construction is ongoing – no environmental issues noted in terms of concrete works. The topsoil was stripped and is stockpiled off site due to limited space on-site. The subsoil is also being stripped and spoiled off site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	Environmental Monitoring Report No. 4 FOI Reservoir and Water Tower on Portion of E1 of E1 325, Pacaltsdorp, George Local Municipality, Western Cape  Compiled by: Midland Environmental Reference: OE024/1317/06 Report Period: August 2024

5.	September 2024	The temporary construction site fence is in place. No-go demarcation of the artificial wetland has been stolen and will be replaced for the installation of the permanent fence. Layer works for the reservoir is ongoing and the water tower construction is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 3 PCB Reservoir and Water Tower on Portion of BE of RP 232, Paarlswater, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/07 Report Period: September 2024
6.	October 2024	The temporary construction site fence is currently being replaced with a permanent fence (clear-vu). The permanent fence is the no-go fence. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. Stormwater management needs to be installed along the new fence. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 4 PCB Reservoir and Water Tower on Portion of BE of RP 232, Paarlswater, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/08 Report Period: October 2024
7.	November 2024	The permanent fence (clear-vu) is installed. The clear-vu fence is the no-go demarcation. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. Stormwater management needs to be installed along the new fence (northern section). The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 5 PCB Reservoir and Water Tower on Portion of BE of RP 232, Paarlswater, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/09 Report Period: November 2024
8.	December 2024	The permanent fence (clear-vu) is installed. The clear-vu fence is the no-go demarcation. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. Stormwater management needs to be installed along the new fence (northern section) to	ENVIRONMENTAL MONITORING REPORT No. 6 PCB Reservoir and Water Tower on Portion of BE of RP 232, Paarlswater, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/10 Report Period: December 2024

		prevent silt-laden runoff washing into the no-go area during the December break period. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	
9.	January 2025	The permanent fence (clear-vu) is being installed. The clear-vu/temporary fence is the no-go demarcation. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. Stormwater management needs to be installed along the new fence (northern section) to prevent silt-laden runoff washing into the no-go area. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 9 FOE Reservoir and Water Tower on Portion of R5 of R1 325, Paarlburg, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/11 Report Period: January 2025
10.	February 2025	The permanent fence (clear-vu) is being installed. The clear-vu/temporary fence is the no-go demarcation. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 10 FOE Reservoir and Water Tower on Portion of R5 of R1 325, Paarlburg, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/12 Report Period: February 2025
11.	March 2025	The permanent fence (clear-vu) is being installed and will be completed once the stormwater pipeline has been installed. The clear-vu/temporary fence is the no-go demarcation. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 11 FOE Reservoir and Water Tower on Portion of R5 of R1 325, Paarlburg, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO24/1319/13 Report Period: March 2025

12.	April 2025	The permanent fence (clear-vu) is being installed and will be completed once the stormwater pipeline has been installed. The clear-vu and temporary fence is the no-go demarcation. Construction of the reservoir and water tower is ongoing – no environmental issues noted in terms of concrete works and site management. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 12 FOR Reservoir and Water Tower on Portion of R5 of B1 225, Paarltsdorp, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO25/1319/14 Report Period: April 2025
13.	May 2025	The permanent fence (clear-vu) is being installed and will be completed once the stormwater pipeline has been installed. The clear-vu and temporary fence is the no-go demarcation. Construction of the water tower and pump station is ongoing – no environmental issues noted in terms of concrete works and site management. Excavation for the stormwater pipeline will start in due course. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 13 FOR Reservoir and Water Tower on Portion of R5 of B1 225, Paarltsdorp, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO25/1319/14 Report Period: May 2025
14.	June 2025	The permanent fence (clear-vu) has almost been fully installed and will be completed once the stormwater pipeline has been installed. The clear-vu and temporary fence is the no-go demarcation. Construction of the water tower and pump station is ongoing – no environmental issues noted in terms of concrete works and site management. Excavation for the stormwater pipeline has begun and the stormwater pipeline is being installed. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 14 FOR Reservoir and Water Tower on Portion of R5 of B1 225, Paarltsdorp, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO25/1319/14 Report Period: June 2025

15.	July 2025	The permanent fence (clear-vu) has been installed. The clear-vu and temporary fence (still in place) is the no-go demarcation. Construction of the water tower, pump station, guardhouse and generator room are ongoing – no environmental issues noted in terms of concrete works and site management. Excavation for the stormwater pipeline has begun and sections of the stormwater pipeline are being installed. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. An additional silt fence has been installed in the north-eastern corner. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 15 FOR Reservoir and Water Tower on Portion of R2 of B1 525, Paarlburg, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO25/1319/17 Report Period: July 2025
16.	August 2025	The permanent fence (clear-vu) has been installed, the last section will be installed in due course. The clear-vu and temporary fence (still in place) is the no-go demarcation. Construction of the water tower, pump station, guardhouse and generator room are ongoing – no environmental issues noted in terms of concrete works and site management. Excavation and installation of the first section of the stormwater pipeline is done and topsoil has been replaced. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The subsoil is also being stripped and spoiled off-site. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 16 FOR Reservoir and Water Tower on Portion of R2 of B1 525, Paarlburg, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO25/1319/18 Report Period: August 2025
17.	September 2025	The permanent fence (clear-vu) has been installed. Construction of the water tower, pump station, guardhouse and generator room is complete. Backfilling, shaping and rehabilitation (topsoil and grass seed mix) to follow. Installation of the stormwater pipe and outlet structure is in process. The topsoil of the reservoir site has been stripped and is stockpiled off site due to limited space on-site and topsoil of the southern pipeline is stockpiled next to the pipe route. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	ENVIRONMENTAL MONITORING REPORT No. 17 FOR Reservoir and Water Tower on Portion of R2 of B1 525, Paarlburg, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Reference: GEO25/1319/19 Report Period: September 2025

18.	Final Report October 2025	The permanent fence (clear-vu) has been installed. Construction of the reservoir, water tower, pump station, guardhouse and generator room and interconnecting pipework are complete. Backfilling, shaping and rehabilitation of all disturbed areas are complete. Installation of the stormwater pipe and outlet structure is complete. The rescued topsoil has been replaced (back on top), and indigenous grass seed mix was spread – grass seed is starting to grow. The contractor and holder are compliant with the EMPr and EA requirements/conditions.	FINAL ENVIRONMENTAL MONITORING REPORTING 18 2025 Reservoir and Water Tower on Portion 40 NF of 31° 255, Paoltsdorp, George Local Municipality, Western Cape  Compiled by: Hilland Environmental Pty (Pvt) Ltd. GEO2611/17/26 Report Period: October 2025
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4. PHOTOGRAPHIC EVIDENCE AND OBSERVATIONS

On-site photographs taken by the Environmental Auditor at the site inspection on 12 December 2025 with Niel van der Westhuizen of Zutari present.

 Civil construction infrastructure relating to the construction phase and containers were removed. Reservoir, water tower and associated infrastructure have been completed. The Clearvu site boundary fence is functional.	 The eroded quarry was not negatively affected by the development.
 The emergency overflow has been completed. Follow up alien clearing is required.	 Rehabilitation of the pipeline footprint to the overflow is in progress.

	
The parking area has been shaped and the contractors camp removed.	The clear vu fence is in place and rehabilitation is in progress.
	
Stormwater management is satisfactory after a rain event.	Civil works have been completed and mechanical work to start in 2026 and to be completed in June 2026. The area at the blue pipe was left open for the mechanical works to take place.
	
Rehabilitation in low lying and level areas is more successful than in steeper areas.	Rehabilitation in some steeper areas needs monitoring and additional seeding and watering if required.
	
Regrowth is taking place in the pipeline footprint.	Rehabilitation of the pipeline footprint is not yet complete.

5. OVERALL COMPLIANCE

5.1 Compliance Evaluation of EA

The 34 Conditions of the EA were audited. During the civil construction phase all conditions were Compliant or Not Applicable. The EA Conditions addressed impacts sufficiently. No new impacts or risks were identified based on the auditor site inspection on 12 December 2025.

Environmental Auditor comments:

The civil construction phase has been concluded successfully. However, mitigation measures for the interim phase, while mechanical work is in progress and before site hand over to George Municipality, needs clarification to remain compliant.

- There is currently not an environmental file on site. It is recommended that the EA and a notice with a QR (Quick Response) code regarding the availability of the environmental file is displayed at the guard house/ security office until the facility becomes operational.
- Stormwater management was addressed satisfactory during the construction phase. Ongoing monitoring is recommended, especially after extreme rain events, to monitor for signs of erosion. If erosion is noticed remedial actions should be implemented.
- Rehabilitation was addressed during the construction phase and is still in progress. Ongoing monitoring is recommended as there are still bare patches present. Where necessary relevant remedial actions should be implemented.

5.2 Compliance Evaluation of Zutari EMPr

All conditions were compliant or could not be assessed as the civil construction was completed and the site camp removed. The EMPr mitigation measures addressed potential environmental impacts sufficiently. No new impacts or risks were identified based on the site inspection on 12 December 2025.

Environmental Auditor comments:

- Some method statements were not developed in the pre-construction phase. However, potential environmental impacts were managed satisfactorily.
- Rehabilitation is in progress at the gabion structure, in the fenced area and in the pipeline footprint. Ongoing monitoring is recommended to identify where additional seeding is required.
- Alien plant management was done during construction but follow up is required to remain compliant. It is recommended that the George Municipality technical department undertake scheduled alien clearing of the site as part of their ongoing maintenance actions.

5.3 HillLand Environmental Monitoring Reports

Environmental Auditor comments:

- Based on the information provided in the 18 Environmental Monitoring Reports the auditor agrees that construction was compliant with the EA and EMPr.
- The format and headings of the EMPr and construction phase Environmental Monitoring Checklists are not well aligned but covers the important mitigation measures satisfactory.
- A professional level of environmental management was achieved during construction by HillLand Environmental, Icon Construction and Zutari.

6 SUMMARY OF FINDINGS

The External Environmental Audit site inspection, conducted on 12 December 2025, and the review of the EA, EMPr and the Environmental Monitoring Reports confirms that the Holder is compliant with the conditions of the EA Conditions and the Environmental Management Programme (EMPr). The EMPr has proven effective in mitigating and guiding the environmental impacts of the construction activities. The ECO complied with requirements and practical solutions were implemented as required on-site.

The development is in accordance with the approved Site Development Plan and measures are in place to manage stormwater and protect sensitive environmental areas. However, ongoing monitoring is required to ensure alien vegetation management and stormwater management remains compliant.

No major environmental risks or unmanaged impacts were identified.

A professional level of environmental management was achieved during the construction phase by HillLand Environmental, Icon Construction and Zutari.