

THE PROPOSED DEVELOPMENT OF A ONE (1) MEGALITRE POTABLE WATER RESERVOIR ON ERF 37, LEEU-GAMKA

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

Development Phase: Construction completed and reservoir operational.

EIA Reference Number: 16/3/3/1/C2/7/0039/24

NEAS Reference: WCP/EIA/0001566/2024

Date of issue: 2 April 2025



Prepared for: Prince Albert Municipality

Date submitted: 4 March 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.

A handwritten signature in black ink, appearing to read 'M Alant', with a circular flourish at the end.

Maretha Alant

EAPASA Registration Number 2022/5417

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

DOCUMENT CONTROL

REFERENCE	REVISION	DATE	AUTHOR
2026_02_04	V1	4 March 2026	Maretha Alant

APPROVAL FOR RELEASE

Name	Organisation	Signature
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I&APs	Refer to Appendix 4	

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 4: List of I&APs

CONTENT OF AN ENVIRONMENTAL AUDIT REPORT

In accordance to Regulation 34 of GN R. 982 of the NEMA: EIA Regulations, 2017, as amended the holder of an authorisation must, for the period during which the environmental authorisation and EMPr, and where applicable the closure plan, remain valid—

- a) Ensure that the compliance with the conditions of the environmental authorisation and the EMPr, and where applicable the closure plan, is audited; and
- b) Submit an environmental audit report to the relevant competent authority.

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 3: 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 2 April 2025 as it relates to the new Leeu-Gamka 1 megalitre potable water reservoir on Erf 37 (EA Ref. 16/3/3/1/C2/7/0039/24. (2) the Updated EMPr dated 25 April 2025 – EA Condition 11. (3) Review of Environmental Monitoring Reports (1-7) 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	Refer to Sections 3 and 5.

- Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	
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 4 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

Maretha Alant was appointed by Prince Albert Municipality to conduct an External Environmental Audit in terms of compliance with conditions 17 and 18 stipulated in the Environmental Authorisation (EA) and to comply with the approved updated Environmental Management Programme (EMPr). SMEC Consulting Engineers managed the construction phase.

Condition 11 of the EA required that the EMPr is updated to incorporate all the conditions contained in the EA. The updated EMPr was resubmitted to the Competent Authority on 25 April 2025, prior to commencement of construction activities. Experienced Environmental Control Officers (ECOs) Hilland Environmental were appointed for compliance monitoring of the project.

The Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the construction phase. Construction of the reservoir was completed on 10 December 2025. A site visit with the ECO, representatives of the Prince Albert Municipality and the environmental auditor was conducted on 23 February 2026 to gather evidence for the Environmental Audit Report.

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 Project Background

The development entailed the construction of a 1Mℓ potable water reservoir directly next to the existing 1Mℓ potable water reservoir and the existing 200Kℓ raw water reservoir on Erf 37, Leeu Gamka, Prince Albert Municipal area. The reservoir is approximately 5m high and 18m in diameter and positioned to the north-east of the existing 1Mℓ reservoir. It is similar in size and height to the existing storage reservoir. The new reservoir is within a new approximate 4500m² fenced utilities area.

The installation of the associated pipelines connecting the reservoirs was included in the EMPr, as it is located within the development footprint (fenced in area). The installation of the other pipelines (water and sewer) and sewage pump station associated with the Upgrading of the Leeu Gamka Water and Sanitation project was also included in the EMPr as NEMA Duty of Care - as the sewage pump station and pipelines (water and sewer) does not currently trigger any listed activities itself in terms of NEMA EIA Regulations (2014, as amended).

The Environmental Authorisation (EA Ref. 16/3/3/1/C2/7/0039/24) was granted on 2 April 2025.

The scour outlet headwall must still be constructed. However, this falls within the approved area demarcated for clearance of vegetation and clearing is complete (authorised activity – LN3, Activity 12).

List of Activities Authorised

Listed Activities	Activity/Project Description
Environmental Impact Assessment Regulations Listing Notice 3 of 2014, Government Notice No. 985 of 4 December 2014 (as amended)	
Activity Number: 2 Activity Description: <i>The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.</i> 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.	<i>The proposed entails the development of a new 1 000m³ reservoir on Erf 37 in Leeu-Gamka. The erf is currently zoned public open space and contains indigenous vegetation.</i>
Activity Number: 12 Activity Description: <i>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> 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 on erven 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	<i>The construction of the new 1Mℓ potable water reservoir and associated infrastructure (fenced in area, fence, pipe connections etc.) will require more than 300m² clearance of indigenous vegetation within an area currently zoned as Open Space.</i>

v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	
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Figure 1. Locality Map

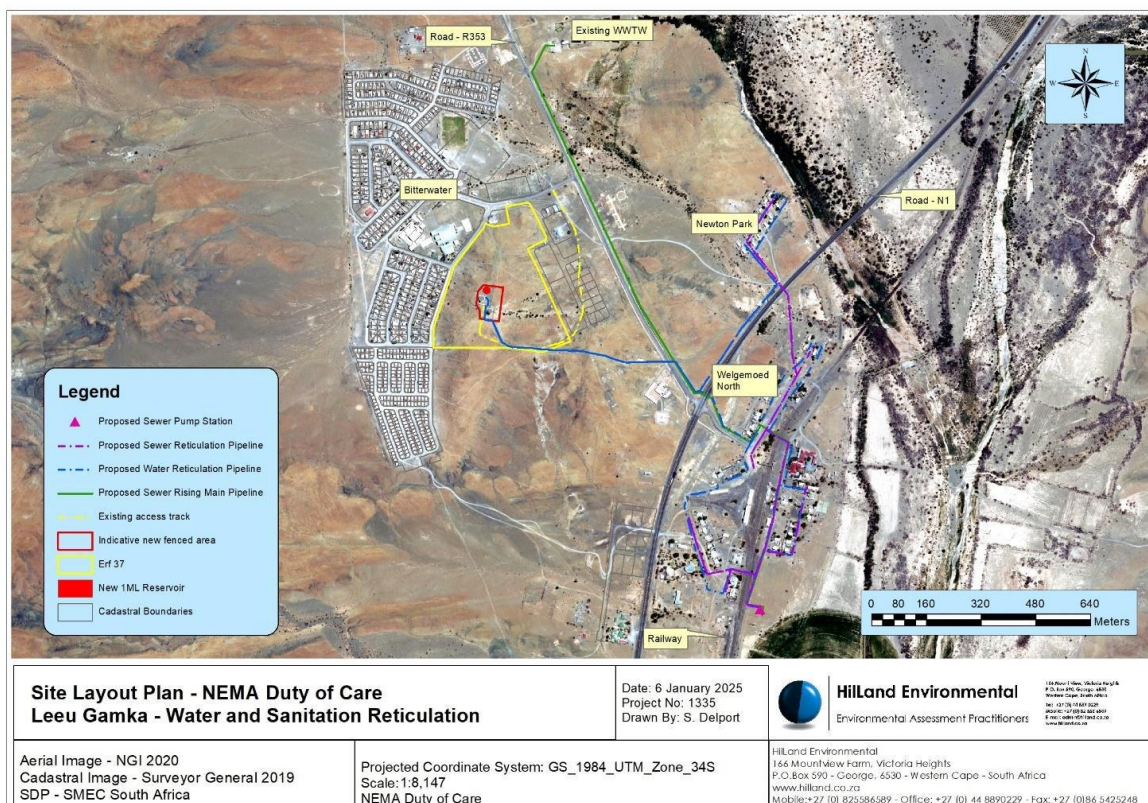


Figure 2. Site Plan—red line showing the new fenced area and new reservoir – red circle. Access will remain via existing track – yellow dotted line

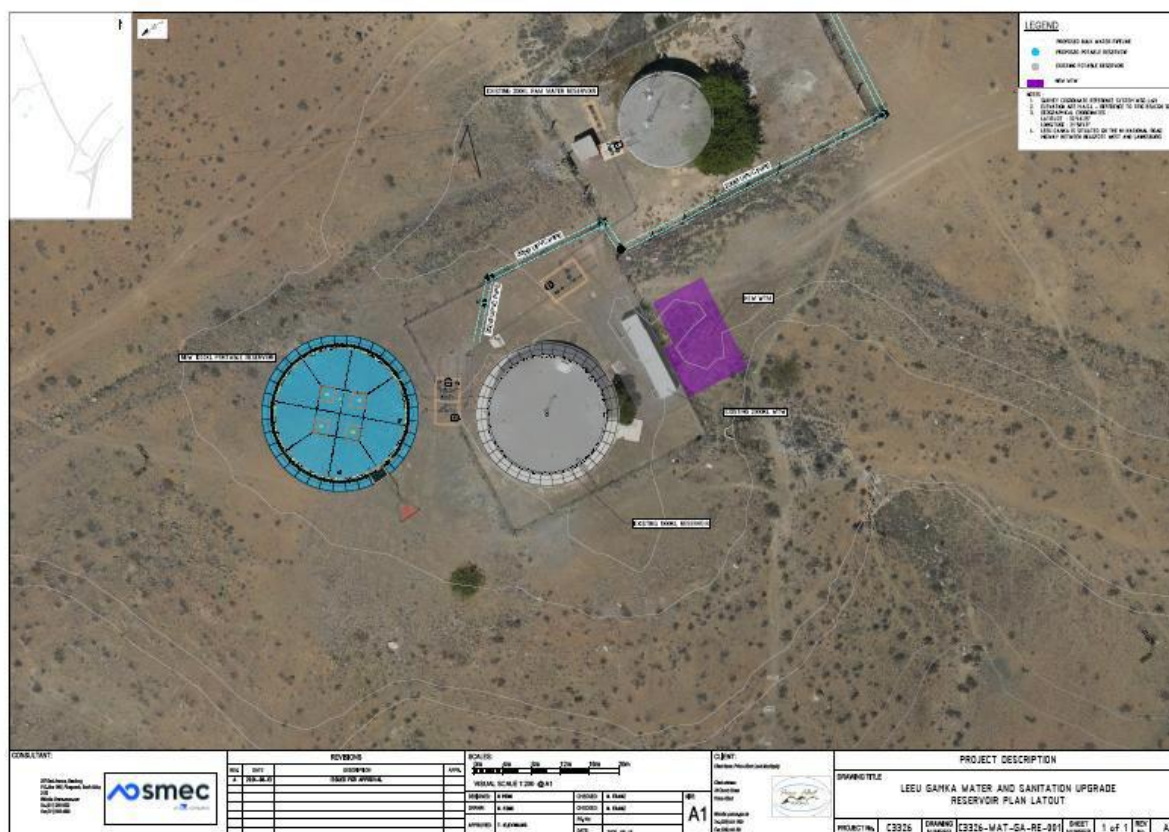


Figure 3. Engineering Site Development Plan (SMEC, 2024), the new reservoir is indicated in blue

2 REPORTING REQUIREMENTS

2.1 Methodology

This external Environmental Audit Report was undertaken by considering the conditions of the EA and the updated EMPr, review of the (6) 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 not relevant at time of audit.

2.2 Consultation Process

As per Section 34(6) of the 2014 EIA Regulations, as amended, and the EA Condition 20 a public consultation process is required for the 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 21 applicable conditions within these categories, as follows:

Category	Number of conditions
F. Conditions of Authorisation	
Scope and Validity period of authorisation	5
Notification and administration of appeal	1
Written notice to the Competent Authority	3
Management of activity	3
Monitoring	4
Auditing	4
Specific Conditions	1

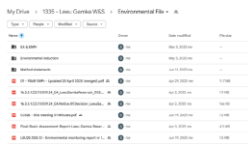
No	Condition of Authorisation	Final Environmental Monitoring Report (no 7) findings	Compliance Rating	Environmental Auditor Comment
	Scope and Validity Period of authorisation			
1.	This Environmental Authorisation is granted for the period from date of issue until 30 April 2030 (validity period), during which period the Holder must ensure that the— (a) physical implementation of all the authorised listed activities is started with and concluded; (b) construction monitoring and reporting requirements are undertaken and submitted to the Competent Authority in time to allow said authority to process such documents timeously; (c) post construction rehabilitation and monitoring requirements is undertaken and completed; and (d) environmental auditing requirements are complied with; and that such auditing is finalised in time to allow the competent authority to be able to process the environmental audits timeously within the specified validity period. 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	Physical implementation of the listed activities commenced in May 2025 and were concluded by December 2025. This environmental monitoring report will be submitted to the CA along with all previous (6) ECO monitoring reports. The post construction monitoring is completed and reported on in this monitoring report. The external environmental auditor will be appointed in due course as required in terms of the EA.	Compliant	The external environmental auditor was appointed on 13 February 2026.

	Environmental Management Act, 1998 (Act no. 107 of 1998). 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 Regula			
2.	Holder is authorised to undertake the listed activities specified in Section B above in respect of the preferred alternative described in the FBAR, dated 31 October 2024, on the site as described in Section D above. This Environmental Authorisation is for the implementation of the preferred alternative which entails: The proposed development of a new one megalitre (1Mℓ) reservoir on Erf 37 in Leeu-Gamka. The proposed reservoir will connect to the existing storage reservoir on Erf 37 and will be five metres (5m) in height and eighteen metres (18m) in diameter. The proposed reservoir will be developed approximate to the following design plans drafted by SMEC Consulting Engineers attached as Annexure 2 and Annexure 2A to this environmental authorisation, namely the: • <i>1ML Potable Water Reservoir Ground Floor Plan & Roof Plan</i> (Drawing No: C3326-CIV-RES-001; Sheet No: 1 of 6; Rev. A) dated 1 February 2023 ; and • <i>1ML Potable Water Reservoir Section 1-1, Section 2-2 & Details</i> (Drawing No: C3326-CIV-RES-003; Sheet No: 3 of 6; Rev. A) dated 1 February 2023.	The construction of the reservoir is complete (authorised activity LN3, Activity 2). A stormwater / scour wall is still to be constructed; However, this falls within the approved area demarcated for clearance of vegetation and clearing is complete (authorised activity – LN3, Activity 12).	Compliant	Construction of preferred alternative completed.
3.	This Environmental Authorisation may only be implemented in accordance with the approved	The EMPr has been approved and implemented – refer to condition 10.	Compliant	The EMPr was implemented satisfactorily based on discussions with

	Environmental Management Programme (“EMPr”).			HillLand Environmental and review of Environmental Monitoring Reports.
4.	The Holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.	Compliance with the conditions have been ensured, the holder remains responsible.	Compliant	Compliance with conditions were satisfactory based on discussions with HillLand Environmental and review of Environmental Monitoring Reports.
5.	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.	There were no changes to or deviations from the scope of the approved alternative.	Compliant	No changes or deviations were necessary based on input provided by HillLand Environmental.
	Notification and administration of appeal			
6.	6. The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 6.1. notify all registered Interested and Affected Parties (“I&APs”) of – (a) the decision reached on the application; (b) the reasons for the decision as included in Annexure 3; (c) the date of the decision; and (d) the date when the decision was issued. 6.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2025 detailed in Section H below; 6.3. draw the attention of all registered I&APs to the manner in which they may access the decision;	Done on the 2nd April 2025. 	Complaint	Evidence was provided by HillLand Environmental.

	6.4. provide the registered I&APs with the: (a) name of the Holder (entity) of this Environmental Authorisation, (b) name of the responsible person for this Environmental Authorisation, (c) postal address of the Holder, (d) telephonic and fax details of the Holder, (e) e-mail address, if any, of the Holder, (f) 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 National Appeals Regulations, 2025. 6.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the holder notifies the registered I&APs of this decision. 6.6. 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.			Commencement of works was on the 14th May 2025 – more than 20 days after the notification of decision. No appeals were lodged.
	Written notice to the Competent Authority			
7.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities on site. 7.1. The notice must make clear reference to the site details and EIA Reference number given above. 7.2. The notice must also include proof of compliance with the following conditions described herein: Condition no.: 6 and 13	Done on the 25th April 2025. 	Complaint	Evidence was provided by Hilland Environmental.
8.	Seven calendar days' notice, in writing, must be given to the Competent Authority on completion of the construction activities.	Notice was provided to DEADP on 10 December 2025.	Complaint	Evidence was provided by Hilland Environmental.

				
9.	The Holder must notify the competent authority if the non-operational phase (construction activities and rehabilitation measures) has been abandoned prior to completion thereof, or if the construction activities and rehabilitation process will be placed on hold for a period of six (6) months or longer. The competent authority must be notified in writing— 9.1. within 30-calendar days of the cessation of the activities on site; and 9.2. seven calendar days' notice, must be given prior to any activities continuing on site again.	The construction phase is completed; therefore, no such notification was necessary.	Complaint	Based on findings at site inspection on 23 February 2026.
	Management of activity /activities			
10.	The Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is herewith approved.	The EMPr has been approved and implemented.	Compliant	Evidence was provided by Hilland Environmental.
11.	The EMPr must be updated to incorporate all the conditions contained in this Environmental Authorisation and all those measures for the avoidance, management, mitigation, monitoring and reporting as identified in this Environmental Authorisation additional to those contained in the approved EMPr.	The EMPr was updated and submitted to DEADP on the 25th April 2025. 	Compliant	Updated EMPr dated 25 April 2025 was reviewed by Auditor.
12.	The approved EMPr (including the additional measures for the avoidance, management, mitigation, monitoring and reporting identified in the Environmental Authorisation) must be included in all contract documentation for all phases of implementation.	The approved EMPr has been made available to the contractor prior to commencement of any activities on site. Responsibility to comply with the EMPr has been included in the tender document.  <i>Screenshot of the tender document</i>	Compliant	Evidence was provided by Hilland Environmental.

		<i>relating to compliance with the EMP</i>		
	Monitoring			
13.	The Holder must appoint a suitably experienced environmental control officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	Hiland Environmental (represented by Stefan Delport) was the appointed ECO for the duration of the construction and rehabilitation phase.	Compliant	Evidence was provided by Hiland Environmental.
14.	The ECO must– 14.1. be appointed prior to commencement of any works (i.e., demarcation of the remaining natural area, relocation of bulbs; and disturbance, cutting and / or damage to protected flora species); 14.2. conduct site inspections; 14.3. ensure compliance with the EMPr and the conditions contained herein; 14.4. keep record of all activities on the site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO; 14.5. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised. 14.6. submit ECO Reports to the Competent Authority as per the frequency indicated in the EMPr.	Done – 3 April 2025. As noted in all ECO reports. No transgressions noted. Clearance of approved area and construction of the reservoir are complete. The ECO remained employed. All ECO (6) monitoring reports including this (7th and final) monitoring report was submitted to the CA.	Compliant	Evidence was provided by Hiland Environmental.
15.	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 EA and EMPr was in the environmental file on site and on the shared Google Drive folder. 	Compliant	Evidence was provided by Hiland Environmental.

16.	Access to the site (referred to in Section D) must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	No DEADP site visits recorded during the reporting period.	Compliant	Access to the site was available and an environmental file was on site.
	Environmental Auditing			
17.	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.	There was full compliance with the EA and EMPr. The holder is in the process of appointing the external auditor and will submit the environmental audit report within 3 months of completion of construction (December 2025, audit due March 2026)	Compliant	There was compliance with the EA and EMPr. External Environmental Auditor was appointed on 13 February 2026.
18.	The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme: 18.1. During the non-operational phase (construction phase) the Holder must submit an Environmental Audit Report to the Competent Authority within three (3) months of completion of the construction phase. Note: Failure to complete the auditing requirements at least three months prior to expiry of the validity period of the environmental authorisation may result in the Holder not being able to comply with all the environmental auditing and reporting requirements.		Compliant	Environmental Audit Report was submitted to CA on 4 March 2026 within time frame.
19.	The Environmental Audit Report, must – 19.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not		Compliant	Environmental Auditor is independent. EAPASA Registration Number 2022/5417

	be the ECO or EAP who conducted the EIA process; 19.2. provide verifiable findings, in a structured and systematic manner, on– (a) the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and (b) the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity. 19.3. identify and assess any new impacts and risks as a result of undertaking the activity; 19.4. evaluate the effectiveness of the EMPr; 19.5. identify shortcomings in the EMPr; 19.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 19.7. 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; 19.8. indicate the date on which the operational phase was commenced with and the progress of the rehabilitation; 19.9. include a photographic record of the site applicable to the audit; and 19.10. be informed by the ECO reports.			Refer to Sections 3 and 5. Refer to Section 5. No new impacts or risks identified. The EMPr was effective. Refer to Sections 3 and 5. No shortcomings were identified for the construction phase and no changes needed. Works commenced on 14 May 2025 and was concluded by December 2025. Notification of commencement was provided to DEADP on 25 April 2025. Notification of completion was provided to DEADP on 10 December 2025. Refer to Section 4 for photographic record. The 7 ECO Reports were reviewed.
20.	The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).		Compliant	The Audit Report will be available on the HilLand Environmental website and I&APs will be notified within 7 days.
	Specific conditions		Compliant	

21.	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority. Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.	No heritage remains were exposed during bulk excavations.	Compliant	No heritage remains were exposed and no reporting required based on feedback from HillLand Environmental.
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3.2 Environmental Management Programme

HillLand Environmental was appointed as the ECO. The 6 Environmental Monitoring Reports and a Final Report (refer to Section 3.3) addressed compliance with the updated EMPr. The approved EMPr dated 7 January 2025 was updated 25 April 2025 – Condition 11 of EA.

Compliance requirements of the updated EMPr are as follows:

- Pre-construction Phase (Section 7.1)
- General Construction Requirements (Section 7.2)
- Rehabilitation Phase (Section 8)
- Monitoring requirements and reports (Section 9)
- Auditing requirement (Section 10)
- Operational Phase (Section 11)
- Decommissioning Phase (Section 12)

Pre-construction Phase (Section 7.1)

No.	Condition	Compliance rating	Environmental Auditor comment
7.1.1	Environmental induction	Compliant	Environmental induction was done with the main contractor on 5 May 2025 and all staff on site on 22 May 2025.
7.1.2	Method Statement	Compliant	Method statements were developed for the road and site camp layout
7.1.3	Plant rescue and clearance and animal protection	Compliant	No plant rescue required.
7.1.4	Demarcation of Working Zone and No-Go areas	Compliant	Demarcation was in place as confirmed in Environmental Monitoring Reports.
7.1.5	Topsoil and subsoil management areas	Compliant	Limited topsoil available.
7.1.6	Heritage and Cultural Resources	Compliant	No heritage resources were exposed during bulk excavations.

General Construction Requirements (Section 7.2)

No.	Condition	Compliance rating	Environmental Auditor comment
7.2.1	Access to the site	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.2	Site Agent	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.3	Use of local labour	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.4	Health and Safety	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.5	Site camp	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.6	Storage of construction material	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.7	Fire protection	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.8	Waste management	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.9	Ablution facilities	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.
7.2.10	Concrete and cement works	Compliant	Based on discussions with HilLand Environmental and review of Environmental Monitoring Reports.

7.2.11	Soil erosion and stormwater management	Compliant	Based on discussions with HillLand Environmental and review of Environmental Monitoring Reports.
7.2.12	Noise, dust management and nuisance measures	Compliant	Based on discussions with HillLand Environmental and review of Environmental Monitoring Reports.

Rehabilitation Phase (Section 8)

Condition in EMPr	Final Environmental Monitoring Report (no 7) findings	Compliance Rating	Environmental Auditor Comment
All building rubble and waste must be completely removed and disposed of at an approved landfill site	All building rubble and construction related waste have been removed from the site.	Compliant	At site inspection on 23 February 2026 no rubble or waste was noted
Compacted topsoil must be raked loose	Construction activity remained within the development zone (fenced off area). A gravel layer was placed around the reservoir to limit potential dust pollution. As there were limited to no topsoil at the start of the project, there were no topsoil to replace at the end of construction.	Compliant	At site inspection on 23 February 2026 the gravel layer was in place. Very limited plant growth is possible on the site.
Existing dirt tracks / roads used during construction to be left to the satisfaction of the landowner, ECO, and Engineer	The existing access track(s) to the reservoir site was used and maintained during the construction phase and was left in a satisfactory condition.	Compliant	At site inspection on 23 February 2026 the access track was in satisfactory condition.
Contaminated soil must be disposed of at an approved landfill site	Contaminated soil in the form of cement at the batching area and oil leak has been removed and disposed of at the waste disposal facility (as reported by the contractor at the time).	Compliant	At site inspection on 23 February 2026 there was no evidence of contaminated soil.
Stockpiled topsoil to be returned to areas disturbed and devoid of topsoil, placed back on top and NOT be compacted	The area within which the reservoir is located is a utilities erf which will remain in use and no rehabilitation to natural vegetation is required	Compliant	At site inspection on 23 February 2026, it was obvious that rehabilitation to natural vegetation was not feasible.

Implementation of additional measures as indicated by the ECO	No additional requested	Compliant	Based on discussions with HillLand Environmental ECO at site inspection on 23 February 2026.
A suitable seed mix to stabilize the soil and prevent erosion will be recommended by the ECO as required	No stabilisation required. The area is flat, and there are no signs of soil erosion. The fenced off area is being used as a municipal utilities erf and therefore no seed mix for stabilisation was required.	Compliant	At site inspection on 23 February 2026 no soil erosion was present.
Plant rescue material to be replanted	There were no rescuable plants noted prior to commencement of earthworks. No planting within utility erf required.	Compliant	At site inspection on 23 February 2026, it was obvious that replanting is not a viable option.

Monitoring requirements and reports (Section 9)

Condition	Compliance rating	Environmental Auditor comment
An induction meeting with the ECO and the contractor to ensure that they are aware of the requirements of this EMP and the EA before the commencement of the construction phase.	Compliant	Environmental induction was done with the main contractor on 5 May 2025 and all staff on site on 22 May 2025.
Induction registers to be kept for all contractors on site.	Compliant	Induction registers was in on site Environmental file.
The ECO must inspect work areas prior to commencement and demarcate no-go areas or indicated areas of sensitivity.	Compliant	No-go areas were demarcated prior to commencement based on review of Environmental Monitoring Reports.
The ECO is to do a site inspection monthly during the construction phase of the reservoir and the initial rehabilitation upon completion thereof and submit a monthly compliance monitoring report to DEADP, the applicant/engineer, contractor and competent authority.	Compliant	Monthly Environmental Monitoring Reports were submitted and reviewed by the Environmental auditor (refer to Section 3.3).
The ECO monitoring reports are to advise on any remedial actions or changes that are required to the method statements in order to ensure that the impacts identified and any that may become evident are mitigated and managed.	Compliant	All issues were addressed satisfactorily based on the Environmental Monitoring Reports.
ECO monitoring reports of the pipelines construction (water and sewage) and the sewage pump station need to be submitted monthly to the resident engineer for the contractor and to the local authority. It is not a requirement for these reports to be submitted to DEADP.	Compliant	Site inspections and meetings were held monthly with engineers and project team. Pipeline construction (water and sewage) and the sewage pump station still needs to be constructed.

Upon completion of the construction phase, a final monitoring report must be submitted by the ECO to sign-off compliance with environmental requirements. The report must be submitted to DEADP and the applicant within 6 months of the completion of all construction activities (irrespective of the status of the rehabilitation).	Compliant	Final Monitoring Report was drafted and reviewed by environmental auditor.
Copies of all compliance reports must be sent to DEADP for record purposes.	Compliant	Environmental Monitoring Reports were emailed to DEADP.

Auditing requirement (Section 10)

Condition	Compliance rating	Environmental Auditor comment
The holder of the Environmental Authorisation (EA) is required to appoint a suitable and qualified independent EAP (not the ECO or the EAP who undertook the NEMA process) to conduct an Audit of the EA and EMPr 6 months after rehabilitation is completed for the reservoir site.	Compliant	The External Environmental Auditor was appointed on 13 February 2026.
The audit is to report on the success of the implementation of the EA and the EMPr as the case may be	Compliant	Refer to Sections 3 and 5.

Operational Phase (Section 11)

Condition	Compliance rating	Environmental Auditor comment
The Municipality needs to do inspections or repairs on the reservoir or associated infrastructure. The applicant can choose to appoint an Environmental Control Officer (ECO) or make use of the Prince Albert in-house Environmental Officer for the duration of the operational phase repairs to monitor compliance against the CONSTRUCTION PHASE of this Environmental Management Programme (EMPr).	Compliant	At site inspection on 23 February 2026, it was discussed that there should be monthly monitoring of the site by the Price Albert Municipality Environmental Intern (in-house Environmental Officer). The Site Manager has the key to the gate and does daily inspections. Any environmental concerns will be reported to the in-house Environmental Officer.

The Decommissioning Phase (Section 12) is not relevant to this audit.

3.3 Environmental Monitoring Reports

The external Environmental Auditor reviewed the Environmental Monitoring Reports (no 1 to 6) and the Final Environmental Monitoring Report (no 7).

Summary of Environmental Monitoring Reports prepared by HillLand Environmental

No	Dates	ECO Conclusion and Recommendations	Cover of Environmental Monitoring Reports
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1.	May 2025	Construction phase commenced during this reporting period. • Temporary site demarcation has been installed and must be maintained throughout the construction phase. • Existing access track to the site is being used and must be maintained for the duration of the construction phase. • No rescuable plants were identified. Bulk excavations of the reservoir floor started, and excavation material is carted to the municipal disposal facility. • The environmental file is kept up to date and is in the site office. • The contractor and holder are compliant with the EMPr and EA requirements/conditions.	
2.	June 2025	Construction phase commenced in May 2025. Temporary site demarcation has been installed and must be maintained throughout the construction phase. • There are no signs of the construction activity entering into the no-go area. • Existing access track to the site is being used and must be maintained for the duration of the construction phase. • No rescuable plants were identified. Reservoir blinding layer is done and steel fixing for the floor in process. • Excavation for the chambers was done with the excavator (and pecker). • The environmental file is kept up to date and is in the site office. • The contractor and holder are compliant with the EMPr and EA requirements/conditions.	
3.	July 2025	• Temporary site demarcation has been installed and must be maintained throughout the construction phase. • Construction material is stockpiled in the site camp. • Existing access track to the site is being used and must be maintained for the duration of the construction phase as per the method statement. • Reservoir floor and chamber walls are done. Concrete mixing is done in the site camp – sump in place. • The environmental file is kept up to date and is in the site office. • The contractor and holder are compliant with the EMPr and EA requirements/conditions.	

4.	August 2025	• Temporary site demarcation has been installed and must be maintained throughout the construction phase. • Construction material is stockpiled in the site camp. • Existing access track to the site is being used and must be maintained for the duration of the construction phase as per the method statement. • Reservoir wall (first lift) is done. Concrete mixing is done in the site camp – sump in place. • The environmental file is kept up to date and is in the site office. • The contractor and holder are compliant with the EMPr and EA requirements/conditions.	
5.	September 2025	• Temporary site demarcation has been installed and must be maintained throughout the construction phase. • Construction material is stockpiled in the site camp. • Existing access track to the site is being used and must be maintained for the duration of the construction phase as per the method statement. • Reservoir wall (second lift) is done. Concrete mixing is done in the site camp – sump in place. • The environmental file is kept up to date and is in the site office. • The contractor and holder are compliant with the EMPr and EA requirements/conditions.	
6.	October 2025	• Temporary site demarcation has been installed and must be maintained throughout the construction phase. The permanent fence will be installed in due course. • Construction material is stockpiled in the site camp. • Existing access track to the site is being used and must be maintained for the duration of the construction phase as per the method statement. • Reservoir roof curing period and installation of pipes in process. Concrete mixing was done in the site camp with no spillage noted. • The environmental file is kept up to date and is in the site office. • The contractor and holder are compliant with the EMPr and EA requirements/conditions.	

7.	Final: November and December 2025	• The environmental file was kept up to date and in the site office for the duration of the construction phase. • The contractor and holder are compliant with the EMPr and EA requirements/conditions. • The construction phase associated with the authorised activities are complete. The contractor and holder were in full compliance with the EMPr and EA requirements/conditions. • It should be noted that the scour outlet headwall must still be constructed (within the demarcated utilities erf, and the position of the fence will shift to the position as described in the EMPr at a later stage. The fence was installed on the (current) position due to budget constraints. • The holder is in the process of appointing an external auditor. The construction completion external environmental audit report will be submitted within 3-months of completion, March 2026, to close the file. • The EMPr's Duty of Care section will still be implemented when the installation of the other pipelines (water and sewer) and sewage pump station associated with the Upgrading of the Leeu Gamka Water and Sanitation project. The installation of the associated pipelines connecting the reservoirs is included in this EMPr, it is located within the development footprint (fenced in area). The installation of the other pipelines (water and sewer) and sewage pump station associated with the Upgrading of the Leeu Gamka Water and Sanitation project is also included in this EMPr as NEMA Duty of Care - as the sewage pump station and pipelines (water and sewer) does not currently trigger any listed activities itself in terms of NEMA EA Regulations (2014, as amended).	
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4. PHOTOGRAPHIC EVIDENCE AND OBSERVATIONS

Photographs taken by the Environmental Auditor at the site inspection on 23 February 2026 with Stefan Delpont of HilLand Environmental and 2 representatives of the Prince Albert Municipality present (the Environmental Intern/in-house Environmental Officer and Site Manager).

Key observations at site inspection on 23 February 2026:

- Construction of the 1 Ml reservoir was completed.
- The perimeter fence is in place with locked access gates.
- All building rubble and waste was removed from site.
- Gravel layer is in place for the utility site and rehabilitation with indigenous plants is not feasible. Some regrowth of patches of grass was noted after the rain but this will likely be short term.
- Additional works will take place in the utility site footprint in terms of Duty of Care as listed activities were not triggered.
- The access road to the site is in satisfactory condition.

	
Construction of the 1 ML reservoir was completed.	The gravel layer is in place and all building rubble and waste was removed from site.
	
The perimeter fence is in place and there are locked access gates.	The Price Albert Municipality in-house Environmental Officer and the Site Manager attended the site inspection on 23 February 2026.
	
Position where the scour outlet headwall will be constructed.	The access road to the site is in satisfactory condition.

5. OVERALL COMPLIANCE

5.1 Compliance Evaluation of EA

The 21 Conditions of the EA were audited. During the construction phase all conditions were Compliant. The EA Conditions addressed impacts sufficiently. No new impacts or risks were identified based on the documents reviewed and the auditor site inspection on 23 February 2026.

Environmental Auditor comments:

- The construction phase has been concluded successfully.
- A stormwater / scour wall is still to be constructed. The construction footprint falls within the approved area demarcated for clearance of vegetation and clearing is complete (authorised activity – LN3, Activity 12). Procedures are in place for ongoing environmental monitoring. The Price Albert Municipality Environmental Intern / in-house Environmental Officer will conduct

monthly site visits. The Site Manager has the key to the gate and does daily inspections. Any environmental issues observed will be reported to the in-house Environmental Officer.

- Post construction rehabilitation with indigenous vegetation is not feasible on this utility site.

5.2 Compliance Evaluation of updated HillLand Environmental EMPr

All conditions of the updated EMPr dated 25 April 2025 were compliant.

The EMPr mitigation measures addressed potential environmental impacts sufficiently. No new impacts or risks were identified based on the review of documentation and the site inspection on 23 February 2026.

Environmental Auditor comments:

- The site and access road are being well managed from an environmental perspective during the operational phase.

5.3 HillLand Environmental Monitoring Reports

Environmental Auditor comments:

- Based on the information provided in the 6 Environmental Monitoring Reports and Final Report the auditor agrees that construction was compliant with the EA and updated EMPr.
- A professional level of environmental management was achieved during construction by HillLand Environmental, SMEC Engineers and the Prince Albert Municipality.

6. SUMMARY OF FINDINGS

The External Environmental Audit site inspection, conducted on 23 February 2026, and the review of the EA, updated EMPr and the Environmental Monitoring Reports confirms that the Holder is compliant with the conditions of the EA and the updated EMPr.

The updated EMPr has proven effective in mitigating the environmental impacts of the construction activities. The ECO complied with requirements of the EMPr and comprehensive and informative monthly Environmental Monitoring Reports were submitted.

Based on the audit conducted, it was established that the ability of the EA and EMPr (and where applicable, the closure plan) was achieved in terms of:

- a) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;
- b) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
- c) Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.

No major environmental risks or unmanaged impacts were identified. A professional level of environmental management was achieved during the construction phase by HillLand Environmental, SMEC Engineers and the Prince Albert Municipality. The facility is currently in the operational phase.