

PEAK SERVICE STATION: Final Environmental Audit



2025

Peak Service Station Final Environmental Compliance Audit by
Chand Consultants

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ABBREVIATIONS

EA | Environmental Authorisation

EMPr	Environmental Management Program
ECO	Environmental Control Officer
DEA&DP	Department of Environmental Affairs & Development Planning
I&APs	Interested and Affected Parties
NCR	Non-Conformance Report
NEMA	National Environmental Management Act (No 107 of 1998 as amended)

APPENDICES

Appendix A	Environmental Authorisation
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1. INTRODUCTION

1.1 Background to this Report

The Peak Service Station involved the decommissioning of three 23 m³ and one 14 m³ (83 m³ in total) underground storage tanks and associated infrastructure, located at Erf 94741, Gardens, Cape Town, Western Cape. Erf 94741 is approximately 1403.1 m² in extent and is situated within Ward 115 of the City of Cape Town Metropolitan. Please refer to Figure 1 below to view the locality of the site.

In summary the decommissioning included:

- 1) Removal of three 23 m³ unleaded petrol UST's
- 2) Removal of one 14m³ diesel UST
- 3) Removal of the forecourt including:
 - a) pump dispensers
 - b) fuel tank filler points
 - c) separator system for surface runoff
 - d) associated underground fuel and filler lines
 - e) canopy

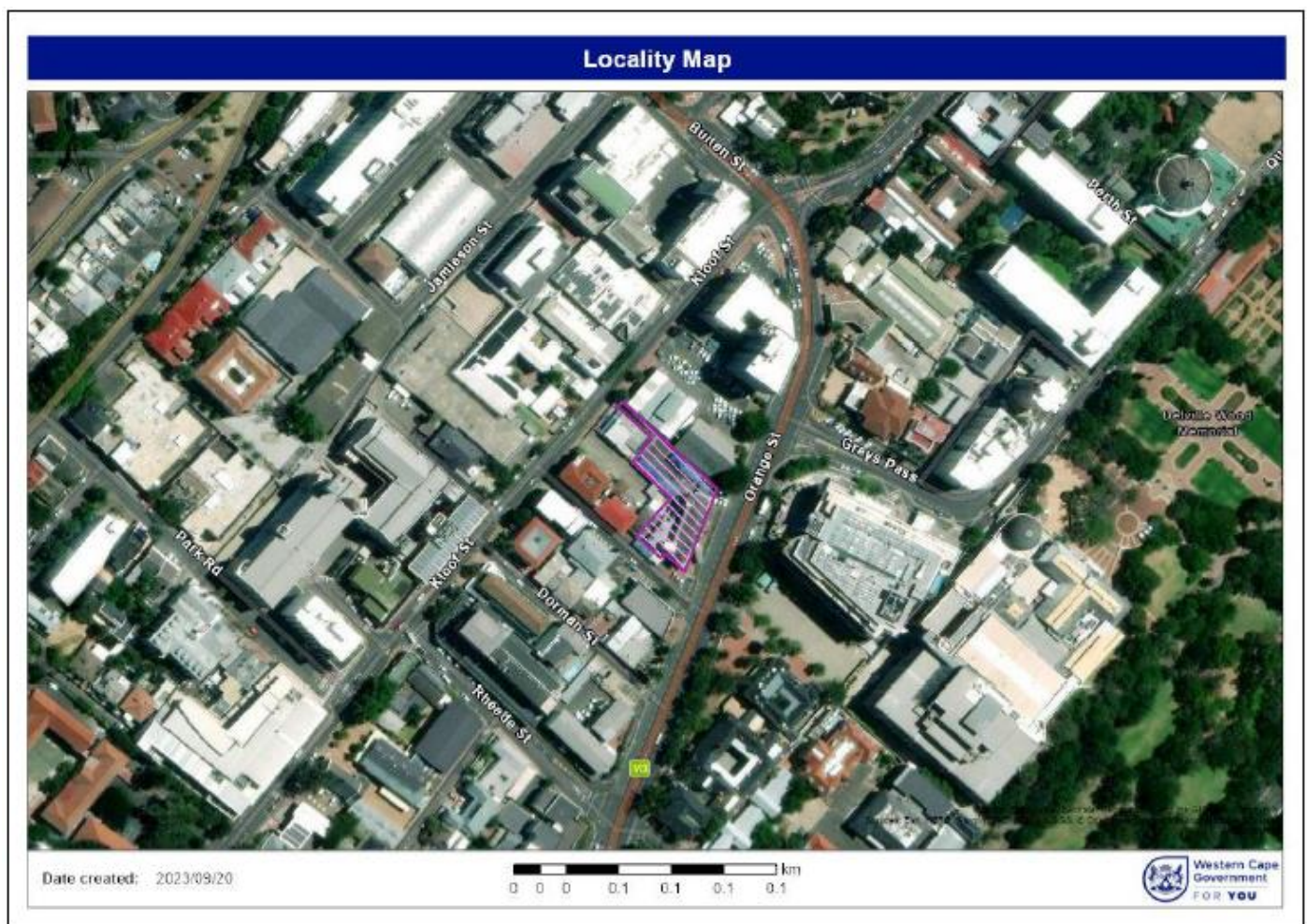


Figure 1. Site Locality Map (CapeFarmMapper, 2022)

1.2 Assumptions and Limitations

The audit is based upon the assumptions that:

1. The findings and observations detailed in this report are based upon visual inspections by the auditors, interviews and scrutiny of documents, and information. The auditors cannot be held responsible for

incorrect conclusions drawn as a consequence of being issued with obsolete documents or information being withheld.

2. This audit is not intended to be an assessment of compliance with all environmental legislation. Its focus is on the authorisations under which the facility operates. However, if contraventions of other environmental legislation or legislation which has a bearing on environmental management are noted, this is highlighted.

1.3 Details and Expertise of the Author

TABLE 1: DETAILS OF AUTHOR

Auditor	Chand Consultants
Contact Person:	Ms. Sabrina Thorndike
Postal address:	Block A, Plum Park, 4 St Clair Road, Plumstead, 7800
Telephone number:	(021)762 3050
E-mail address:	sabrina@chand.co.za
Qualifications:	BA. Hons Environmental Studies (Stellenbosch University) BA. Development and Environment (Stellenbosch University)

Sabrina Thorndike has a BA Honours degree in Environmental Studies as well as a bachelor's in Development and Environment from Stellenbosch University. Her academic history in environmental management gives her key insights in the fields of environmental legislation and compliance. Since joining Chand in February 2024, she has provided essential project support to senior consultants, assisting with report writing and management of specialists and has led the auditing, monitoring and compliance of several developments and construction sites within the Western Cape region.

1.4 Purpose Of This Report

This report details the results of the Final Environmental Audit conducted by Ms. Sabrina Thorndike on the 11th of February 2025. This audit was conducted against the EMPr and EA which was provided by the ECO.

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

1.5 Scope, Purpose, and Objective of this Audit

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

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

NATURE OF APPROVAL DOCUMENT	DOCUMENT REFERENCE	DATE OF ISSUE	SECTION REFERENCE
Positive Environmental Authorisation: in Terms of The National Environmental Management Act, 1998 (Act 107 of 1998) and The Environmental Impact Assessment Regulations, 2014 (As Amended): Proposed closure of four (4) underground storage tanks and associated infrastructure in Erf 94741, 42 Orange Street, Gardens	16/3/3/1/A7/9/3012/24	10/09/2024	Table 4
Environmental Management Programme	SEC REFERENCE NUMBER: 023086	May 2024	Table 5

2. AUDIT METHODOLOGY

The following methodology was employed for this external audit.

2.1 Review of Documentation

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

2.2 On-site Audit

As mentioned above, the audit was conducted on the 11th of February 2025 by Ms. Sabrina Thorndike (Chand Consultants). The auditor conducted a walk-through and inspection of the site, addressing each aspect of the process as required. Photographs were taken as evidence.

The site is currently hoarded and access is restricted as there is another construction site on the same property. The Auditor scheduled a site visit with the current Contractors to gain access.

2.3 Reporting

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

3. COMPLIANCE

3.1 Compliance Framework

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

1. Administrative conditions which detail when reports must be submitted etc.
2. Pre-decommissioning requirements;
3. Decommissioning requirements; and
4. Post-decommissioning rehabilitation requirements.

While all conditions are important, it is clear that they do not all have the same significance when reviewing compliance or lack thereof, particularly with respect to their impact on the environment. Experience has shown that the use of a numerical scale to rank compliance and more importantly non-compliance is problematic as it can often result in dispute over the scale and individual scores and does not lead to a comprehensive understanding of the significance of a specific non-compliance in many instances. For this reason, the auditor has chosen to use a system which has been successfully used in other audits which recognises five compliance statuses (refer to **Table 3** and **Figure 2** for an explanation of each).

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

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

TABLE 3 EXPLANATION OF THE FIVE COMPLIANCE RATINGS

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

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

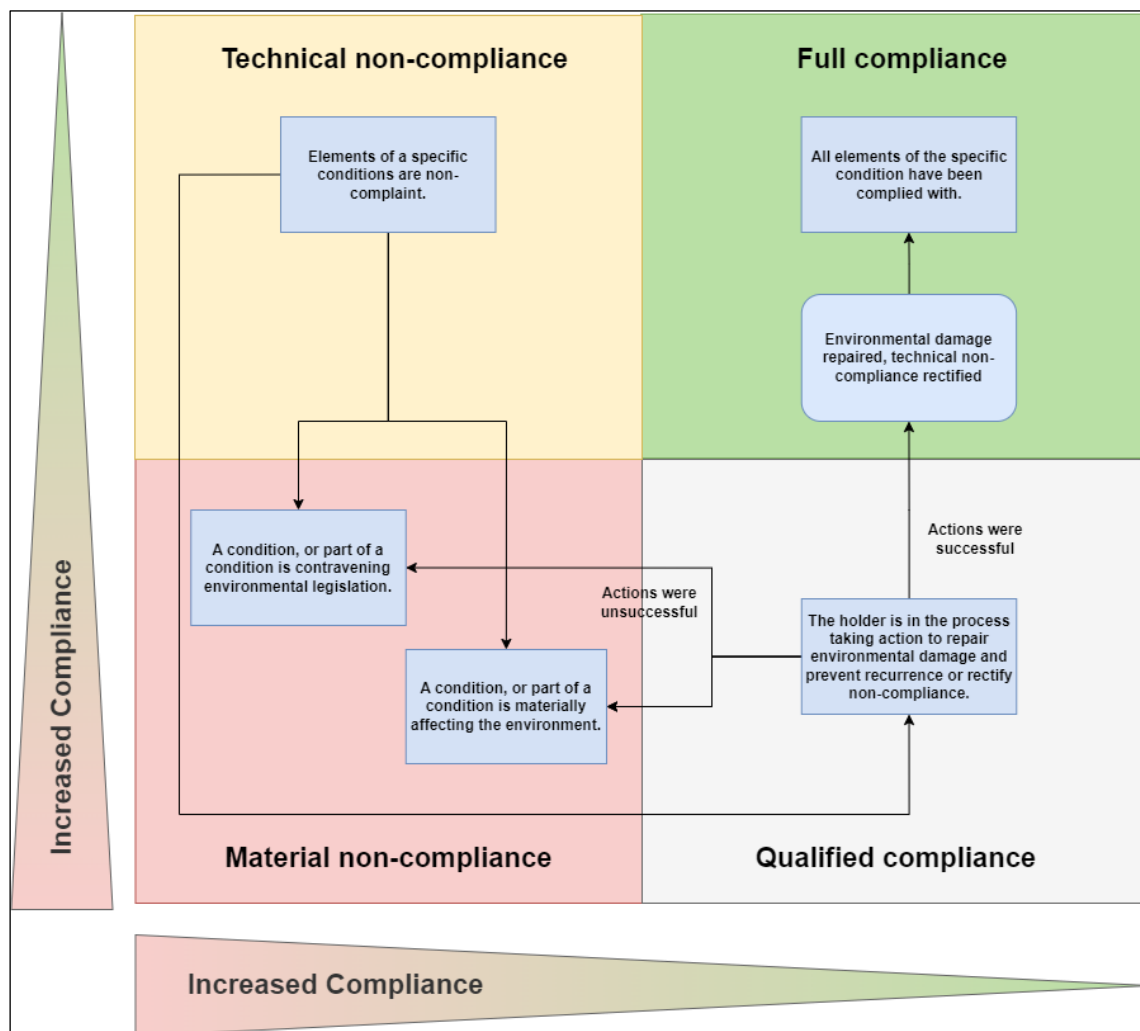


Figure 2: Explanation of Compliance Ratings Used in this Audit Report

3.2 Compliance Checklist

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

Table 4: Environmental Authorisation

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
1.	The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Alternative described in Section B above.	Full compliance	<p>The listed activities stated in Section B of the EA includes “The closure of existing facilities, structures or infrastructure for—</p> <p>(i) any development and related operation activity or activities listed in this Notice, Listing Notice 2 of 2014 or Listing Notice 3 of 2014;</p> <p>(ii) any expansion and related operation activity or activities listed in this Notice, Listing Notice 2 of 2014 or Listing Notice 3 of 2014;</p> <p>(iii) ...</p> <p>(iv) any phased activity or activities for development and related operation activity or expansion or related operation activities listed in this Notice or Listing Notice 3 of 2014; or</p> <p>(v) any activity regardless the time the activity was commenced with, where such activity:</p> <p>(a) is similarly listed to an activity in (i) or (ii) above; and</p> <p>(b) is still in operation or development is still in progress;</p> <p>This was undertaken during the early phases of construction and was carried out on Erf 94741 as stipulated in the EA.</p>
2.	<p>The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.</p> <p>This Environmental Authorisation is granted for –</p> <p>(a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised Listed Activity.</p> <p>(b) A period of ten (10) years, from the date the holder commenced with the authorised Listed Activities, during which period the authorised Listed Activity must be concluded.</p>	Full Compliance	<p>The license was issued on the 10th of September 2024. Construction commenced in November 2024 and concluded in December 2024. All listed activities commenced within five years of the date of issue for the EA and concluded within ten years of the commencement of the listed activity.</p>
3.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including an implementing agent, sub-contractor, employee or any person rendering a service to the holder.	Full Compliance	The appointed ECO monitored works carried out on site in accordance with the approved EMPr.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
4.	Any changes to, or deviations from the scope of the alternative described in section B above must be approved in writing by the Competent Authority before such changes or deviations may be implemented. In assessing whether or not to grant such approval, 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.	Full Compliance	No changes or deviations to the scope of Section B have been communicated to Chand.
5.	A written notice of seven (7) calendar days must be given to the Competent Authority before commencement of the development activity. The notice must make clear reference to the site details and EIA Reference number given above. The notice must include proof of compliance with the following conditions described herein: Conditions: 6, 7 and 11.	Full Compliance	Sillito Environmental Consulting notified the Competent Authority seven (7) calendar days before the commencement of the activity.
6.	The holder must in writing, within fourteen (14) calendar days of the date of this decision – 6.1. Notify all registered Interested and Affected Parties ("I&As") of – 6.1.1.the decision reached on the application; 6.1.2.The reasons for the decision as included in Annexure 3; 6.1.3.The date of the decision; and 6.1.4.The date when the decision was issued; 6.2. Draw the attention of all registered I&As to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below; 6.3. Draw the attention of all registered I&As to the manner in which they may access the decision; 6.4. Provide the registered I&As with the:	Full Compliance	6.1. There is only one registered I&AP for this project. This I&AP was notified of the decision of the EA. Sillito Consulting ensured to include the following information within the notification: <ul style="list-style-type: none"> • The outcome of the application • The reasons for the decision • The date of the decision • The date of issue 6.2. The I&As right to appeal was made clear. 6.3. The EA was attached to the I&AP notification letter. 6.4. All necessary details of the holder as well as contact details of the decision maker has been included.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	6.4.1. name of the holder (entity) to this Environmental Authorisation, 6.4.2. name of the responsible person for this Environmental Authorisation, 6.4.3. postal address of the holder, 6.4.4. telephonic and fax details of the holder 6.4.5. e-mail addresses, if any, of the holder; and 6.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeals Regulations, 2014 (as amended)		
7.	The listed activities, including site preparation, must not be commenced with within twenty (20) calendar days from the date the applicant notifies the registered I&APs of this decision.	Full Compliance	The listed activities did not commence within twenty (20) calendar days from the date the applicant notifies the registered I&APs of this decision.
8.	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.	Not Applicable	No appeals have been communicated to Chand. No suspension was necessary.
9.	The Environmental Management Programme ("EMPr") (dated May 2024) is hereby approved and must be implemented.	Full Compliance	The EMPr was implemented by the Client and the Contractors. Compliance was monitored against the EMPr by the appointed ECO.
10.	The Environmental Authorisation and EMPr must be included in all contract documentation for all phases of implementation.	Not Assessed	The auditor did not receive the contract documentation and therefore was not able to assess this requirement.
11.	The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before the commencement of any closure activities to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.	Full Compliance	Sillito Environmental Consulting were appointed as the ECO.
12.	ECO Reports must be submitted to this Directorate on a monthly basis during the closure phase of the project and the final ECO Report within thirty (30) days of the project being finalised.	Full Compliance	The ECO reports were submitted monthly to the DEA&DP. Refer to Appendix C for evidence of this condition.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
13.	A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the site of the authorised activity during the development activities thereafter it must be kept at the office of the holder and must be made available to any authorised person on request.	Full Compliance	All Environmental documents were kept on site within the Environmental file.
14.	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.	Not Applicable	Access was not requested by the Competent Authority.
15.	<p>In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person with the relevant environmental auditing expertise and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended).</p> <p>15.1. The holder must undertake an environmental audit upon completion of the closure activity and submit an Environmental Audit Report to the Competent Authority two (2) month after the completion of the environmental audit. This must include a post-closure site contamination assessment report for recordkeeping purposes.</p> <p>15.2. The holder must, within seven (7) days of the submission of the Environmental Audit Reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the Environmental Audit Report available to any I&APs</p>	Full Compliance	<p>This report serves as the Final Environmental Audit which is prepared by Chand Consultants. Chand Consultants is an independent entity. The finding of the audit report assesses the level of compliance of the EA and EMPr as well as the mitigation measures provided.</p> <p>The auditor will notify all I&APs on behalf of the holder, with the report being hosted on the website of Chand Consultants. This was not assessed as it has not been undertaken at the time of report compilation.</p>

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
	upon request and, where the holder has such a facility, place on a publicly accessible website.		
16.	The audit report must indicate compliance status with the conditions of this Environmental Authorisation, and the EMPs and make recommendations for improved environmental management.	Full Compliance	This report serves as the Final Environmental Audit which is prepared by Chand Consultants. The report indicates compliance with the conditions of the EMP and EA within Table 4 and Table 5 and are summarised in Section 3.3 below.
17.	Should any heritage remains be exposed during excavations or any other actions on the site, this 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 disturbed further until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include, <i>inter alia</i> , 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 artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.	Not Applicable	No heritage resources were found for the duration of the decommissioning phase.
18.	A qualified archaeologist and/or paleontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.	Not Applicable	No heritage resources were found for the duration of the decommissioning phase, as such a qualified archaeologist/palaeontologist was not necessary.
19.	The requirements of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) must be adhered to during the undertaking of the closure activities.	Full Compliance	The ECO has reported that a health and safety officer was appointed to assess compliance.

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
20.	Firefighting equipment must be present on site during the closure activities and the Oil Industry standards must be adhered to.	Full Compliance	Firefighting equipment was present on site.
21.	No contaminated soil must be used as backfill / fill material on the site. Contaminated soil removed must be remediated or disposed of at an appropriately licensed facility.	Full Compliance	No contaminated soil was used to backfill material on site. All contaminated soil was removed from site and clean imported soil was used to backfill the area.
22.	An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste that cannot be recycled, re-use shall be disposed of at a licensed waste disposal facility.	Full Compliance	Waste was stored adequately, stockpiles separated on site and waste was removed weekly.
23.	The applicable requirements with respect to the Noise Regulations in terms of the relevant legislation must be adhered to (as far as possible).	Full Compliance	No excessive noise was experienced on site and no noise complaints were made throughout the decommissioning phase.
24.	Surface, storm, or groundwater must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.	Full Compliance	No contaminated surface water was reported on site and all excavated contaminated material was immediately removed to avoid any impacts on the surrounding environment.
25.	Dust suppression measures must be used to mitigate dust during the closure activities. No potable water must be used to mitigate dust nuisance (as far as possible). Alternative dust suppression methods (such as shade netting screens and/ or straw stabilisation, etc.) must be implemented instead.	Full Compliance	No dust was reported on site and no dust complaints received for the duration of the project.
26.	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	Full Compliance	Local contractors have been appointed for the completion of the project.

Table 5: Environmental Management Programme

CONDITION NUMBER	CONDITION	COMPLIANCE STATUS	COMMENT/ RECOMMENDATION
PLANNING & DESIGN PHASE			
7.1.1. Objective 1: Appoint an Environmental Control Officer (ECO)	A suitably qualified and experienced Environmental Control Officer must be appointed before any activities commence on-site.	Full Compliance	Sillito Environmental Consulting was appointed as the Environmental Control Officer before any activities commenced on site.
7.1.1. Objective 1: Appoint an Environmental Control Officer (ECO)	The ECO should inspect the site weekly for the duration of the decommissioning phase.	Full Compliance	The ECO conducted weekly site inspections for the duration of the decommissioning phase.
7.1.1. Objective 1: Appoint an Environmental Control Officer (ECO)	The appointed ECO must be advised on the decommissioning start date before any activities commence on site so that the ECO can perform a pre-commencement inspection and plan for environmental awareness training of construction workers.	Full Compliance	The ECO conducted a pre-commencement inspection on the 4 th of November 2024. Environmental awareness training was conducted with all present contractors.
7.1.2. Objective 2: Demarcation of Working Areas and No-Go Areas	Prior to the commencement of any decommissioning activities, the outer boundary of the development area must be surveyed, pegged and fenced off. If deemed necessary by the ECO, the outer boundary of the working area can be enclosed with fencing, shade netting, droppers or wire, or similar – as feasible and practical. The fencing should be retained and maintained for the duration of the construction period and must not be moved once approved during construction unless agreed otherwise with the ECO. This demarcation boundary is to ensure that decommissioning activities are restricted to only that area strictly required.	Full Compliance	The site was adequately fenced off with shade netting to appropriately fence the area and restrict activities and access.
7.1.2. Objective 2: Demarcation of	Construction Site Camp (if applicable) & Associated Facilities: The following site camp areas must be identified and demarcated	Full Compliance	The construction site camp and associated facilities were in place on site for the duration of the decommissioning phase.

Working Areas and No-Go Areas	<p>during the pre-Decommissioning Phase of the development:</p> <ul style="list-style-type: none"> • Access Route. • Site camp and site office. • Laydown area. • Ablution area (if applicable). • Eating area and rest area. • Vehicle & equipment maintenance yard. • Refuelling area. • Stockpile area (for stockpiling topsoil, cleared vegetation, spoil material etc.). • Waste storage area. 		
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	<p>Fencing & Security: The site camp area should be secured to prevent unauthorised individuals from entering the site camp and possibly getting injured or posing safety and/or security risk. Adequate signage must be in place, and the site camp and associated areas should be fenced off along the demarcated boundaries of these areas, preferably with shade netting or Bonnox fencing or similar.</p>	Full Compliance	The site was securely fenced throughout the decommissioning phase with security present on site.
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	<p>Fire Fighting Equipment: No less than 2 fire extinguishers should be present in the site camp. The extinguishers should be in working condition and recently serviced. A fire extinguisher should always be present wherever any “hot works” (e.g., welding, grinding etc.) are taking place. It is recommended that all construction workers receive basic training in fire prevention and basic fire-fighting techniques and are informed of the emergency procedure to follow in the event of accidental fires. No open fires may be made on the construction site during any phase of the project. No smoking should be allowed on the construction site. In the case of accidental fires, the contractor shall alert the Local Authority's Fire Department as soon as a fire</p>	Full Compliance	Two fire extinguishers were present on site. Sillito conducted an environmental awareness training with aspects of basic firefighting training. The ECO has advised that Durbell, the engineer responsible, also trains their workers in firefighting techniques.

	starts and not wait until the fire can no longer be controlled.		
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	Waste Storage Area: Sufficient bins for the temporary storage of construction-related waste should be provided inside the site camp and/or at the working area.	Full Compliance	A waste skip was present on site near the working area.
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	Hazardous Substances Storage Area: Fuels, chemicals, lubricants and other hazardous substances must be covered and banded with an approved impermeable liner or have some form of secondary containment. Signage should be posted outside the storage area and within the site camp.	Not Applicable	No hazardous substances were stored on site throughout the decommissioning phase. A cage was present however, was not used.
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	Potable Water: An adequate supply of potable water must be provided to construction workers at the site camp.	Full Compliance	Potable water was supplied on site to construction workers.
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	Ablution Facilities (if applicable): Chemical toilet facilities or other approved toilet facilities (at least 1 toilet for every 15 workers) must be provided and located on the site in such a way that the toilets will not cause any form of pollution of the site. Toilets should be placed within the site camp. Toilets should be placed well outside of any surface drainage/ storm-water canals. The toilets must be placed on a level surface and secured to prevent them from blowing over. The toilets must be serviced regularly and kept in an orderly state. The contractor must ensure that no spillage occurs when the toilets are cleaned, serviced or moved. Performing ablutions outside of the provided toilet facilities is strictly prohibited. The ECO would need to regularly inspect the state of the chemical toilets.	Full Compliance	Ablution facilities were present on site. These were placed within the site camp and were placed on a surface level within the site camp.
7.1.3. Objective 3: Establishment of Site	Eating Area & Rest Area: A dedicated area within which construction workers can rest and	Full Compliance	There was a designated eating area on site.

Camp and Associated Site Facilities	eat during breaks must be provided within the site camp. Seating and shade should be provided.		
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	Vehicle & Equipment Maintenance Yard: Where possible, construction vehicles and equipment that require repair should be removed from the site and taken to a workshop for servicing. If emergency repairs and/or basic maintenance of construction vehicles or equipment are necessary on site, such repair work should be undertaken within the designated maintenance yard area. Repairs should be conducted on an impermeable surface, and/or a tarpaulin and/or drip trays must be laid down prior to emergency repairs taking place, to prevent any fuel/ oil/ lubricant spillages from contaminating the environment.	Not Applicable	No maintenance yard was necessary as no maintenance took place on site for the duration of the project.
7.1.3. Objective 3: Establishment of Site Camp and Associated Site Facilities	Housekeeping: the site camp and related site camp facilities must be kept neat and orderly at all times, to prevent potential safety risks and to reduce the visual impact of the site during construction.	Material Non-Compliance	During the second and third audits (the 20 th and 25 th of November 2024) the ECO noted small amounts of litter on site. This was rectified by the Contractors and not raised in other reports, indicating it was sufficiently closed out by the Contractors.
7.1.4. Object 4: Undertake Pre-Decommissioning ECO Visit	An ECO should be appointed to conduct a pre-decommissioning ECO inspection.	Full Compliance	Sillito Environmental Consulting was appointed as the Environmental Control Officer before any activities commenced on site. A pre-decommissioning ECO inspection was conducted on the 4 th of November 2024.
7.1.4. Object 4: Undertake Pre-Decommissioning ECO Visit	The ECO should undertake Environmental Awareness Training with the contractors and subcontractors prior to land clearing.	Full Compliance	Environmental Awareness Training was undertaken by the ECO on the 4 th of November 2024.
DECOMMISSIONING PHASE			
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater	The appointed Environmental Control Officer (ECO) must undertake at least one site inspection weekly, for the duration of the decommissioning phase, and to produce an ECO report monitoring the compliance of the property developer with the conditions of the approved EMP.	Full Compliance	The appointed ECO conducted one inspection weekly for the duration of the decommissioning phase. Following these inspections, ECO reports were submitted monitoring compliance with the conditions of the approved EMP.

7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater	During the decommissioning phase, an experienced contractor must be appointed, and it must be ensured that the correct protocols will be followed that relate to the handling of materials, thereby minimising the likelihood of any incidents occurring.	Full Compliance	A suitably experienced contractor was appointed, and all protocols were followed to minimise likelihood of incidents occurring.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater	Adequate training of construction personnel will ensure that incidents resulting in product spills are minimised and that the correct actions are taken in the event of an incident(s).	Full Compliance	The ECO conducted environmental awareness training with all personnel on site. This induction included details on corrective actions to be taken in the event of an incident.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater	In the event of such an emergency condition, a suitably trained clean-up contractor must be appointed to clean up the spill. Hazardous waste may be generated when absorbent materials are used to mop up a product spill. This will be suitably contained and handled by a specialist contractor using the correct personal protective equipment and hazardous waste temporary storage receptacles.	Full Compliance	A spill kit was present on site. Contaminated soil was encountered on site during the tank removal, and was removed immediately and not stored on site.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater	Disposal of such waste at a suitable hazardous landfill site with chain-of-custody documentation provided by the contractor as proof of end recipient.	Full Compliance	Contaminated sand was disposed of to a suitable hazardous landfill site. Refer to Appendix G for evidence of this disposal.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater	The ECO will supervise any remediation procedures in order to ensure that the correct material is treated and that the area of contamination has been adequately rehabilitated/remediated.	Full Compliance	Contaminated soil was removed from site by Durbell (the site engineers) and the area backfilled with clean, uncontaminated sand.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Gas-free certification must take place prior to any tank removal commencing, to ensure that the underground fuel storage tanks are free of flammable or explosive vapours and that it is safe to dismantle and to transport.	Material Non-Compliance	The auditor requested the gas-free certification from the applicant. The applicant has stated that the gas-free certification will only be provided once the landfill has completed with the destruction of the tanks. As such, the gas-free certification did not take place prior to any tank removal commencing.
7.2.1. Objective 1: Avoid Contamination and	The two tanks must be completely emptied/cleaned before they are removed from the site. Additionally, the ends of each fuel line must be	Full Compliance	The ECO has reported that Astron and Durbell ensured the correct procedure was followed. The ECO personally noted the adequate

Pollution of the Soil and Groundwater UST REMOVAL	blanked off with plastic bags to prevent the spillage of residual product within the lines.		treatment and removal of the pump station, fuel lines and UST's. Additionally, the disposal slips noted that the tanks were empty.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Any residual fuel must be consolidated and stored as hazardous waste until appropriately removed and disposed of at a registered hazardous disposal facility.	Full Compliance	All residual fuel was removed immediately off site to a registered facility.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Waste disposal receipts are required as proof of safe disposal.	Full Compliance	Waste disposal slips have been received indicating safe disposal by Enviroserv. Refer to Appendix G for evidence of this disposal.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Once USTs have been removed, soil contamination verification must be undertaken to ascertain whether the decommissioning activity has contaminated the surrounding soil. Laboratory analysis of the surrounding soils within the excavations must be undertaken within 24 hours following uplift of the underground fuel storage tanks to prove the absence of contamination. Results of the analysis are to be sent to the Environmental & Heritage Management Branch and the City Health Department.	Full Compliance	Soil was observed to have been contaminated during the tank removal. Laboratory analysis was undertaken to verify the soil contamination. Please refer to Appendix H for evidence of this analysis.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Should the soil be contaminated, the contaminated substrate must be remediated/managed accordingly.	Full Compliance	Contaminated soil was removed from site and adequately disposed of by Enviroserv. Clean sand was imported and used to backfill the excavated area.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Contaminated soil removed during the decommissioning must be stockpiled on an impervious sheet/tarp to prevent the leaching of contaminants into the ground below.	Full Compliance	Contaminated soil was removed immediately and not stockpiled on site, as such no contaminants were at risk of leaching into the ground below.

7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	Exposed stockpiles must be covered with impervious sheets/tarp before a rainstorm.	Not Applicable	Contaminated soil was removed immediately from site and not stockpiled. The clean sand was used on the same day as delivery, as such covers were not necessary. Only bricks and small stones were stockpiled overnight.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater UST REMOVAL	It should be noted that no contaminated soil may be used as fill material on site. Laboratory analysis must be undertaken on the stockpile soil to prove the absence of contamination.	Full Compliance	No contaminated soil was used to backfill the excavations, clean sand was imported to site. Laboratory analysis was undertaken.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Waste Management	Hazardous waste bins must be kept on an impermeable bunded surface capable of holding at least 110% of the volume of the bins.	Full Compliance	No hazardous waste was stored on site. The contaminated soil was removed immediately from site.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Waste Management	Skips/ bins must be provided with secure lids or covering that will prevent scavenging and windblown waste or dust.	Full Compliance	Only general waste was produced on site. Sufficient bins were provided for this waste as it was minimal. All other waste, including hazardous waste, was removed daily or as generated on site.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Waste Management	Waste bins/skips must be regularly emptied and must not be allowed to overflow.	Full Compliance	No overfull bins were reported in the ECO reports.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Waste Management	Construction workers must be instructed not to litter and to place all waste in the appropriate waste bins provided on site.	Material Non-Compliance	The ECO observed litter on site during the second and third audit (the 20 th and 25 th of November 2024). This was rectified by the Contractors and was not reported in any of the other ECO reports.
7.2.1. Objective 1: Avoid Contamination and	All waste (hazardous and general waste) generated on-site from the proposed activities must be disposed of appropriately at a licensed	Full Compliance	All hazardous waste (contaminated soil) was removed of to an appropriately licensed waste facility. Refer to Appendix G for proof of disposal.

Pollution of the Soil and Groundwater Waste Management	Waste Disposal Facility (WDF). Copies of the Waste Disposal Certificates must be kept on record (if applicable).		
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Vehicles and machinery must be in good working order and must be regularly inspected for leaks.	Full Compliance	No faulty machines or leaks were noted within the ECO reports.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	If a vehicle or machinery is leaking pollutants it must, as soon as possible, be taken to an appropriate location for repair.	Not Applicable	No leaks occurred on site throughout the decommissioning phase.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Complete spill kits must be kept and maintained on-site. Construction personnel must be trained on how to use the spill kit.	Full Compliance	A spill kit was available on site.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Repairs to vehicles/ machinery may take place on site, within a designated maintenance area at the site camp. Drip trays, tarpaulin or other impermeable layers must be laid down prior to undertaking repairs.	Not Applicable	No repairs were reported on in the ECO reports.

7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Refueling of vehicles/ machinery may only take place at the site camp or vehicle maintenance yard. Where refuelling must occur, drip trays must be utilised to catch potential spills/ drips.	Not Applicable	No refuelling was reported on in the ECO reports.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Drip trays must be utilised during decanting of hazardous substances and when refilling chemical/ fuel storage tanks.	Not Applicable	No decanting or refuelling took place on site however, drip trays were present on site.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Drip trays must be placed under generators (if used on site) water pumps and any other machinery on site that utilises fuel/ lubricant, or where there is a risk of leakage/spillage.	Full Compliance	Drip trays were present on site throughout the project and were used when necessary.
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	Soil contaminated by hazardous substances must be excavated and disposed of as hazardous waste.	Full Compliance	Contaminated soil was disposed of as hazardous waste.
7.2.1. Objective 1: Avoid Contamination and	Any areas contaminated must be remediated to the satisfaction of the ECO.	Full Compliance	The ECO was satisfied with the remediation of the contaminated areas.

Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)			
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	<p>The following information is to be included in the final Environmental Audit Report, which is to be submitted to the Environmental Management Department and the City Health Department:</p> <ol style="list-style-type: none"> 1. Gas-free certification. 2. Results of the laboratory analysis of the surrounding soils within the excavations and the stockpile soil. 3. Copies of the Waste Disposal Certificates (if applicable). 	Technical Non-Compliance	<p>This report includes the results of the laboratory analysis as well as the copies of the waste disposal certificates, which will be submitted to the Environmental Management Department and the City Health Department following submission of this report.</p> <p>However, the auditor has not received the gas-free certification, as such will be unable to submit this document.</p>
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	<p>As per comments received from the CoCT: Community Services and Health Environmental Health Specialised Services Air Quality Management, the following additional mitigation measures must be implemented:</p> <ol style="list-style-type: none"> 1. When the USTs are removed and it is found that soil contamination by diesel or product seepage, the necessary steps must be undertaken to not only contain contaminated soil but also address any petroleum odours which may be emitted. 2. In this regard, it may be necessary for the applicant to submit additional information pertaining to the proposed mitigation measures which will be implemented to contain odours. 3. Please note that should any air quality-related complaints be received by this office, these complaints will be investigated by the office and if found valid, further requirements may be called for. 	Full Compliance	<p>The mitigation measure recommended by the CoCT: Community Services and Health Environmental Health Specialised Services Air Quality Management, were implemented on site. Contaminated soil was contained and removed from site. There was a complaints register present on site, however, no complaints were received throughout the decommissioning phase.</p>

	4. The Head Specialised Environmental Health Services: City Health reserves the right to call for any further requirements, should the need arise or further information is provided during this reporting process.		
7.2.1. Objective 1: Avoid Contamination and Pollution of the Soil and Groundwater Pollution Management – hydrocarbons (oil, fuel etc.)	As per the comment raised by the DEA&DP: Pollution and Chemicals Management; 1. With regards to the soil contamination verification, to be undertaken at the time that the USTs are removed, should further soil or groundwater contamination be discovered during excavations for the physical removal of the two USTs and associated infrastructure, the Directorate: Pollution and Chemicals Management of the Department of Environmental Affairs and Development Planning (DEA&DP) must be notified in terms of Part 8 of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008).	Full Compliance	Soil contamination verification was undertaken by Astron and all contaminated soil was removed from site and disposed of at a licensed disposal site.
7.2.2. Objective 2: Limit Noise and Dust Impacts	If dust issues occur, dust can be suppressed on access roads and the construction site during dry periods by the regular application of non-potable water or a biodegradable soil stabilisation agent. Under no circumstances should potable water be used for dust suppression. Potable water should not be used for anything other than drinking.	Not Applicable	No dust was observed on site throughout the decommissioning phase.
7.2.2. Objective 2: Limit Noise and Dust Impacts	Dust suppression measures such as the wetting down of sand heaps as well as exposed areas around the site must be implemented especially on windy days.	Not Applicable	No dust was observed on site throughout the decommissioning phase; therefore, no dust suppression measures were needed.
7.2.2. Objective 2: Limit Noise and Dust Impacts	The use of straw worked into the sandy areas may also help and the ECO must advise when this is necessary.	Not Applicable	No dust was observed on site throughout the decommissioning phase; therefore, no dust suppression measures were needed.

7.2.2. Objective 2: Limit Noise and Dust Impacts	If dust appears to be a continuous problem, shade cloth can be used to cover open areas where necessary or the erecting of shade netting above the fenced-off areas may need to be considered.	Not Applicable	No dust was observed on site throughout the decommissioning phase; therefore, no dust suppression measures were needed.
7.2.2. Objective 2: Limit Noise and Dust Impacts	All vehicles transporting sand/waste need to have tarpaulins covering their loads which will assist in any windblown sand occurring off the trucks.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.2. Objective 2: Limit Noise and Dust Impacts	Dust levels specified in the National Dust Control Regulations (GN 827 of November 2013) may not be exceeded.	Full Compliance	No dust was observed on site throughout the decommissioning phase, therefore, the dust levels specified within the National Dust Control Regulations were not exceeded.
7.2.2. Objective 2: Limit Noise and Dust Impacts	A Complaints Register must be available at the site office for inspection by the ECO of dust complaints that may have been received.	Full Compliance	A complaints register was available at the site office, however, no dust complaints were received.
7.2.2. Objective 2: Limit Noise and Dust Impacts	The appointed ECO must undertake regular site inspections for the duration of the construction phase, and produce regular ECO monitoring reports, auditing the compliance with the conditions of the Environmental Authorisation and the approved EMP.	Full Compliance	The ECO conducted weekly inspections for the duration of the project and submitted weekly monitoring reports to audit the compliance with the conditions of the EA and approved EMP.
7.2.2. Objective 2: Limit Noise and Dust Impacts	As per comments received from the CoCT: Community Services and Health Environmental Health Specialised Services Air Quality Management, the following additional mitigation measures must be implemented: <ol style="list-style-type: none"> 1. The responsible person must implement steps to prevent entrained dust from vehicular movement, which may become an off-site dust nuisance in warm and windy weather conditions, by the best practical means possible on-site. 2. The use of non-potable water as a dust suppressant is supported but run-off or stagnant water must be managed to prevent sand from being carried off-site through vehicular movement. 	Not Applicable	No dust was observed by the ECO or reported in the ECO reports; therefore, the additional mitigation measures were not necessary.

	<p>a. Any entrained sand deposits in public roadways must be removed on a regular basis and if necessary, a monitored, street sweeping programme may be necessary.</p> <p>3. Site screening, to be used as a mitigation method to contain dust, must be implemented in a manner that is able to adequately contain dust and should be installed on the perimeter of the site and at areas of potential high dust generation. The materials used should be capable of reducing the quantity of dust being blown off-site to below nuisance levels.</p> <p>4. Please note that should complaints be received by this office, it may be necessary for the responsible person to submit an area/site-specific Dust Management Plan (DMP), directly to this office, for scrutiny.</p> <p>a. The aforementioned DMP will have to comply with the provisions of the National Dust Control Regulations (GN. 36974) dated 1 November 2013, as well as Chapter 9 of the City of Cape Town Air Quality Management By-law, 2016.</p> <p>b. Once authorised, the DMP must be effected on-site and must be adhered to.</p>		
7.2.2. Objective 2: Limit Noise and Dust Impacts	General Air Quality Impacts as per comments received from the CoCT: Community Services and Health Environmental Health Specialised Services Air Quality Management, the following additional mitigation measures must be implemented:	Full Compliance	Upon removal of the UST's it was found that the soil was contaminated. This soil was adequately tested and disposed of. No petroleum odours were reported.

	<ol style="list-style-type: none"> When the UST's are removed and it is found that soil contamination by diesel or product seepage occurred, the necessary steps must be undertaken to not only contain contained soil but also address any petroleum odours which may be emitted. <ol style="list-style-type: none"> In this regard, it may be necessary for the applicant to submit additional information pertaining to the proposed mitigation measures which will be implemented to contain odours. Please note that should any air quality related complaints be received by this office, these complaints will be investigated by the office and if found valid, further requirements may be called for. 		
7.2.2. Objective 2: Limit Noise and Dust Impacts	A noise complaints register must be opened.	Full Compliance	There was a complaints register present on site, however, no noise related complaints were received.
7.2.2. Objective 2: Limit Noise and Dust Impacts	Excavations and earth-moving activities should be restricted to normal construction working hours (7:30 – 17:30) as far as possible.	Full Compliance	All works took place between 7:30 and 17:00.
7.2.2. Objective 2: Limit Noise and Dust Impacts	Vehicles and equipment should be kept in good working condition. If deemed necessary, machinery and equipment should be fitted with mufflers/ exhaust silencers. No unnecessary disturbances should be allowed to emanate from the construction site.	Full Compliance	All equipment was reported to be in good working condition. No additional silencers were required to be fitted.
7.2.2. Objective 2: Limit Noise and Dust Impacts	Noise levels must comply with the relevant health & safety regulations and SANS codes and should be monitored by the Health & Safety Officer as necessary and appropriate.	Full Compliance	Noise levels complied with the relevant health and safety regulations and SANS codes. Normal construction noise was reported on site, no excessive noise was reported.
7.2.2. Objective 2: Limit Noise and Dust Impacts	The appointed ECO must undertake regular site inspections for the duration of the construction phase, and produce regular ECO monitoring audit reports, auditing the compliance of the	Full Compliance	The appointed ECO conducted weekly inspections for the duration of the project and submitted weekly monitoring reports to audit compliance with the conditions of the EA and approved EMP.

	property developer with the conditions of the Environmental Authorisation and the approved EMP.		
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	The contractor must provide a traffic marshal for situations where heavy construction traffic may impede normal traffic flows on any roads adjacent to the site.	Full Compliance	Traffic marshals were present to caution vehicles passing by.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	All drivers and machinery operators must exercise due caution when entering/ exiting the site.	Full Compliance	No impacts to traffic were reported by the ECO in the ECO reports.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	Construction vehicles must adhere to the load-carrying capacity of road surfaces and adhere to all other prescriptive regulations regarding the use of public roads by construction vehicles.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	The Contractor must ensure that any large or abnormal loads (including hazardous materials) that must be transported to/ from the site are routed appropriately, and that appropriate safety precautions are taken during transport to prevent road accidents.	Full Compliance	The ECO has advised that Durbell ensure all vehicles are routed appropriately, and that all appropriate safety precautions are taken during transport to prevent road accidents.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	All vehicles will be legally compliant.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	All drivers will be competent and in possession of an appropriate valid driver's license.	Full Compliance	The ECO has advised that Durbell ensures that all drivers are compliant and that all valid driver's licenses were kept on site.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	All vehicles travelling on site will adhere to the specified speed limits.	Full Compliance	All vehicles adhered to speed limits.

7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	The movement of all vehicles will be controlled such that they remain on designated routes.	Full Compliance	All vehicles remained on designated routes.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	No member of the workforce will be permitted to drive a vehicle under the influence of alcohol or narcotic substances.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	Warning signage (i.e., "trucks turning") must be erected near the access point to the site.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	A traffic marshal should be posted at the entrance to the site to assist with the safe and smooth flow of vehicles on the road whilst heavy construction traffic is entering and exiting the site.	Full Compliance	Traffic marshals were present on site to assist the trucks with turning/parking and to caution traffic passing by.
7.2.3. Objective 3: Limit Traffic Impacts to Existing Road Users, Pedestrians & Road Infrastructure	No construction traffic may access the site after normal working hours as defined by the local authority.	Full Compliance	Working hours were always adhered to, as such, no construction related traffic accessed the site after normal working hours.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	Consult with the ECO when determining the appropriate site for the site camp before the establishment of the site camp on site.	Full Compliance	During the initial site inspection the ECO consulted with the Contractors on the suitable locations for the site camp including eating areas, ablution facilities, rest areas and the main site office.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	The site camp must be kept neat and tidy and free of litter at all times.	Material Non-Compliance	Some litter was noted on site in the audits conducted on the 20 th and 25 th of November 2024. This was rectified by the Contractors and was not reported on in the following ECO reports.
7.2.4. Objective 4: Reduce the Visual Impact of the	Waste must be managed according to the EMPr.	Full Compliance	Waste was managed according to the EMPr.

Decommissioning Phase Activities			
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	Good housekeeping practices on site must be maintained to ensure the site is kept neat and tidy.	Qualified Compliance	Litter was observed on the 20 th and 25 th of November 2024. Good housekeeping was maintained on site following these inspections.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	The site camp, storage facilities, stockpiles, waste bins, and any other temporary structures on site should be located in such a way that they will present as little visual impact to surrounding residents and road users as possible.	Full Compliance	The site camp, storage facilities, stockpiles, waste bins, and any other temporary structures on site were located in such a way that caused as little visual impact to surrounding residents and road users as possible.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	Work on site must be well-planned and well-managed so that work proceeds quickly and efficiently, thus minimizing the disturbance time.	Full Compliance	The decommissioning phase was completed in 4 weeks, indicating that work proceeded quickly and efficiently.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	The site camp will require visual screening via shade cloth or other suitable material.	Full Compliance	The site was fenced with shade cloth for visual screening.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	Special attention should be given to the screening of highly reflective material.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	The use of lighting (if required) should take into account surrounding land users and should present little or no nuisance. Downward-facing, spill-off type lighting is recommended.	Not Assessed	Evidence of the use of lighting was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	Construction vehicles must enter and exit during working hours.	Full Compliance	All working hours were adhered to. No vehicles were reported to enter or exit the site outside of working hours

7.2.4. Objective 4: Reduce the Visual Impact of the Decommissioning Phase Activities	The appointed Environmental Control Officer (ECO) must undertake at least one site inspection weekly for the duration of the Decommissioning Phase, and produce a short ECO report monitoring the compliance of the property developer with the conditions of the approved EMP.	Full Compliance	The appointed ECO conducted weekly inspections for the duration of the project and submitted weekly reports to monitor compliance with the conditions of the EA and approved EMP.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Employees are to be managed in accordance with the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993). The onus is on the contractor/ applicant to ensure that appropriate health and safety risk mitigation measures are implemented.	Full Compliance	All necessary precautions regarding fire, health and safety risks were taken.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	The decommissioning activity must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health & Safety Act (No. 85 of 1993).	Full Compliance	The decommissioning activity complied with all local authority bylaws and all activities were in accordance with the Occupational Health & Safety Act.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Adequate training in emergency response situations of the contractor and personnel undertaking the construction activities will be carried out. All workers on site must be informed of the emergency procedure and must wear appropriate personal protective equipment (PPE), to follow in the event of accidental fires.	Full Compliance	Adequate training was conducted with all personnel regarding emergency procedures to be carried out. All workers on site wore the correct PPE.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	No open fires are permitted on the construction site during any phase of the project. No smoking will be allowed on the construction site.	Not Assessed	No fires were reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Minimisation of hot work by using alternative methods and equipment such as air-driven tools, cold cutting and pre-fabrication off-site.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	The use of appropriate shielding and screening such as blanketing with firefighting foam and water screens must be used to minimise fire risk.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	When Section 30 (emergency incident) of the National Environmental Management Act 107 of 1998, is triggered - the Act defines an emergency incident as 'an unexpected sudden and uncontrolled release of a hazardous	Not Applicable	No emergency incidents occurred on site.

	substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property, the City's Air Quality Management Unit must be notified in writing within the prescribed timeframes, of such incidents that involve emissions to the atmosphere. Any emergency incident, originating at the facility, which falls within the definition of section 30(1)(a) of the National Environmental Management Act (NEMA), Act 107 of 1998, must be dealt with by the facility in accordance with Section 30 of NEMA. In the event of any incident, the facility must ensure containment by the responsible person and report the incident to the DEADP (Mrs Amina Sulaiman, contact number: 021-4832571, email: Amina.Sulaiman@westerncape.gov.za).		
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Adequate training in emergency response situations of the contractor and personnel undertaking the construction activities will be carried out. All workers on site will be informed of the emergency procedure to follow in the event of accidental fires.	Full Compliance	The ECO conducted environmental awareness training on the 4 th of November 2024, prior to works commencing on site.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	No open fires will be allowed on the construction site during any phase of the project. No smoking will be allowed on the construction site.	Not Assessed	Evidence of this was not mentioned in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Minimisation of hot work by using alternative methods and equipment such as air-driven tools, cold cutting and pre-fabrication off-site.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	The use of appropriate shielding and screening such as blanketing with firefighting foam and water screens to minimise fire risk.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Minimisation through spark quenching by wetting down and/or using construction power tools such as jackhammers under sprayed water.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.

7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	A comprehensive site-specific first aid kit must be available on-site at all times.	Full Compliance	A first aid kit was available within the site office.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	At least one person trained in safety and first aid and familiar with the first aid equipment on site must be present at the site at all times.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	Emergency procedures will be established prior to the start of decommissioning works on site.	Full Compliance	Emergency procedures were established prior to the start of decommissioning works occurring.
7.2.5. Objective 5: Avoid Fire, Health & Safety Risk	There should be adequate hazard signage for employees, customers and visitors to the premises to create awareness of possible hazards and to cultivate and encourage risk-conscious behaviour.	Full Compliance	Adequate signage was present on site.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	The two tanks must be completely emptied/cleaned before they are removed from the site.	Full Compliance	The two tanks were emptied. Evidence of this is noted within the waste disposal slips stating that the tanks were disposed of as empty.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Any residual fuel must be consolidated and stored as hazardous waste until appropriately removed and disposed of at a registered hazardous disposal facility.	Full Compliance	No residual fuel remained on site. All soil that was contaminated was removed from site and disposed of at a registered hazardous disposal facility.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Waste disposal receipts are required as proof of safe disposal.	Full Compliance	Waste disposal slips have been obtained. Refer to Appendix G for evidence of these receipts.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Once USTs have been removed, soil contamination verification must be undertaken to ascertain whether the decommissioning activity has contaminated the surrounding soil.	Full Compliance	Soil contamination verification took place. Appendix H has the results from this verification.
7.2.6. Objective 6: Avoid the Risk of Impacting the	Should the soil be contaminated, the contaminated substrate must be remediated/managed accordingly.	Full Compliance	All contaminated soil was adequately removed from site and disposed of at a registered hazardous disposal facility.

Receiving Environment			
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Hazardous waste bins must be kept on an impermeable bunded surface capable of holding at least 110% of the volume of the bins.	Not Applicable	No hazardous waste was stored on site. The contaminated soil was removed from site immediately.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Skips/ bins must be provided with secure lids or covering that will prevent scavenging and windblown waste or dust.	Full Compliance	Minimal waste was generated on site. Only general waste was generated and the bins provided were sufficient and did not cause any windblown waste.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Waste bins/skips must be regularly emptied and must not be allowed to overflow.	Full Compliance	No overfull bins were reported on in the ECO reports.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Construction workers must be instructed not to litter and to place all waste in the appropriate waste bins provided on site.	Qualified Compliance	Construction workers had littered on site on the inspections conducted on the 20 th and 25 th . The workers were instructed by the ECO to not litter to use the waste bins provided on site. Following these incidents of littering, no litter was observed on site by the ECO.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	All waste (hazardous and general waste) generated on site from the proposed activities must be disposed of appropriately at a licensed Waste Disposal Facility (WDF).	Full Compliance	All waste was disposed of at appropriately licensed Waste Disposal Facilities.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Vehicles and machinery must be in good working order and must be regularly inspected for leaks.	Full Compliance	Vehicles and machinery were in good working order. No leaks were reported by the ECO.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	If a vehicle or machinery is leaking pollutants it must, as soon as possible, be taken to an appropriate location for repair.	Not Applicable	No leaking machines or vehicles were reported within the ECO reports.

7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Complete spill kits must be kept and maintained on site. Construction personnel must be trained on how to use the spill kit.	Full Compliance	Spill kits were kept on site and personnel were trained in how to use the spill kit.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Repairs to vehicles/ machinery may take place on site, within a designated maintenance area at the site camp. Drip trays, tarpaulin or other impermeable layers must be laid down prior to undertaking repairs.	Not Applicable	No repairs or maintenance took place on site.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Refuelling of vehicles/ machinery may only take place at the site camp or vehicle maintenance yard. Where refuelling must occur, drip trays must be utilised to catch potential spills/ drips.	Not Applicable	No refuelling took place on site.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Drip trays must be utilised during decanting of hazardous substances and when refilling chemical/ fuel storage tanks.	Not Applicable	No decanting or refuelling took place on site, however, drip trays were present on site and utilised when necessary.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Drip trays must be placed under generators (if used on site) water pumps and any other machinery on site that utilises fuel/ lubricant, or where there is a risk of leakage/spillage.	Full Compliance	Drip trays were present on site throughout the project and were used when necessary.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Soil contaminated by hazardous substances must be excavated and disposed of as hazardous waste.	Full Compliance	Contaminated soil was disposed of as hazardous waste.
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	Any areas contaminated must be remediated to the satisfaction of the ECO. The development of site-specific protocols with regard to the delivery and use of products and the use of the relevant SANS procedures.	Full Compliance	All contaminated soil was removed and the ECO reported that the excavated areas were only backfilled using clean uncontaminated sand.
7.2.6. Objective 6: Avoid the Risk of Impacting the	Impact management actions and monitoring measures required for remediation should any contamination be encountered during the decommissioning phase.	Full Compliance	All contaminated soil was sufficiently removed from site and disposed of at a licensed disposal facility.

Receiving Environment			
7.2.6. Objective 6: Avoid the Risk of Impacting the Receiving Environment	The appointment of a suitably qualified contaminant specialist to monitor the decommissioning of the proposed development and associated infrastructure (if required); and 1. All recommendations provided by organs of state must be included in the EMPr.	Full Compliance	A suitably qualified contaminant specialist was appointed to undertake the laboratory analysis of the soil. Additionally, all recommendation provided by organs of state were included within the EMPr.
7.2.7. Objective 7: Enhance Business & Employment Opportunities	Preference should be given to historically disadvantaged individuals from the local and surrounding communities when appointing employees for construction work.	Full Compliance	Local contractors were responsible for the completion of the project.
POST-DECOMMISSIONING REHABILITATION PHASE			
7.3.1. Objective 1: Rehabilitate disturbed areas & ensure environmentally sensitive site closure	On completion of the construction operations, the site camp area must be cleared of all site camp facilities, ablution facilities, fencing, signage, waste and surplus material.	Qualified Compliance	Fencing remained on site as the site is currently being used for the construction of the building (Dover House) adjacent to the decommissioning area.
7.3.1. Objective 1: Rehabilitate disturbed areas & ensure environmentally sensitive site closure	Surfaces are to be checked for waste products from activities such as concreting or asphaltting and cleared in a manner approved in writing by the ECO.	Not Applicable	No concreting or asphaltting took place on site.
7.3.1. Objective 1: Rehabilitate disturbed areas & ensure environmentally sensitive site closure	Any contaminated soil must be collected and disposed of as hazardous waste. Due to the limited landfill space, it is important that the developer/owner must investigate alternative treatment methods before final disposal at a hazardous waste disposal facility.	Full Compliance	Contaminated soil was sufficiently disposed of at a hazardous waste disposal facility.
7.3.1. Objective 1: Rehabilitate disturbed areas & ensure environmentally sensitive site closure	All construction waste, litter and rubble are to be removed from the site and re-used elsewhere or recycled/disposed of at an appropriate facility. Burying or burning of waste or rubble on site is prohibited.	Material Non-Compliance	Construction rubble was left on site after the decommissioning phase. General building rubble, mixed waste stockpiles and bricks were observed on site. The ECO has advised that some of this material was already on site before the decommissioning phase from the neighbouring site utilising the site as a temporary storage area. However, additional rubble was noticed during the external

			audit, that appears to be left by the decommissioning activities (such as bricks).
7.3.1. Objective 1: Rehabilitate disturbed areas & ensure environmentally sensitive site closure	Any topsoil, subsoil or other excavated material that cannot be utilized during site rehabilitation should be removed from the site and reused elsewhere in the Municipality or disposed of at an appropriate disposal site.	Material Non-Compliance	<p>Construction rubble was left on site after the decommissioning phase. General building rubble, mixed waste stockpiles and bricks were observed on site. The ECO has advised that some of this material was already on site before the decommissioning phase from the neighbouring site utilising the site as a temporary storage area. However, additional rubble was noticed during the external audit, that appears to be left by the decommissioning activities (such as bricks from the forecourt area).</p> <p>Additionally, the recently backfilled areas were left exposed and the Auditor observed large amounts of sand around the site and on the adjacent sidewalk and road outside of the site boundaries.</p> <p>The applicant has advised that the site is now used by another developer and that this developer will clean the site once their works have completed.</p>
7.3.1. Objective 1: Rehabilitate disturbed areas & ensure environmentally sensitive site closure	Final landscaping and rehabilitation of the site must be done to the satisfaction of the ECO and signed off by the ECO.	Not Assessed	Evidence of this was not reported on in the ECO reports, as such the auditor is unable to assess this requirement.

3.3 General Audit Findings

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

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

- Works on site commenced during November 2024 and concluded in December 2024.
- Pre-decommissioning inspection was conducted on the 4th of November 2024.
- Environmental training was undertaken by the ECO on the 4th of November 2024.
- Based on the ECO reports, it appeared as though the environmental commitments of the EMPr and EA were largely understood.
- Overall, there have been very few significant environmental non-compliances during the decommissioning phase. The ECO has kept a record of all non-compliances with a recommendation available in the ECO reports.
- There have been no impacts on the surrounding environment.
- It is evident that mitigation measures contained within the EMPr as well as the ECO's recommendations were sufficient and effective in preventing and/or limiting impacts that may have resulted from the construction phase.
- No EMPr amendments were deemed necessary by the ECO or the auditor, therefore no amendments requested.
- The ECO submitted a final ECO report which detailed the conclusion of the decommissioning phase.
- Although contaminated soil was encountered on site, this soil was sufficiently removed from site and disposed of at a licensed hazardous waste disposal facility. Only clean sand was used to backfill.

The points below are noteworthy as it relates to compliance with the EA issued on the 10th of September 2024. Issues have been noted within Table 4.

- Sillito Environmental Consulting was appointed as the ECO for the duration of the decommissioning phase.
- All listed activities commences within five years of the date of the EA being issued.
- Notification of commencement was issued to the authority.
- The I&AP's were notified of the EA decision.
- The weekly ECO reports were submitted to the DEA&DP.
- No pollution incidents were reported.
- No heritage resources were uncovered.
- The Department submitted a formal letter confirming compliance with Conditions 1, 2, 5, 6, 7, 9, 11, 12, 13, 14, 20, 21, 22, 25 and 26 of the EA.

Non-compliances noted within this report include the following:

- Moderate amounts of litter were observed on site during inspections conducted by the ECO on the 20th and 25th of November 2024, indicating a repeat non-compliance. The litter consisted mainly of energy drink cans. However, this was rectified by the Contractors, and sufficient housekeeping was observed during the following audits.
- The auditor requested the gas-free certification from the applicant. The applicant has stated that the gas-free certification will only be provided once the landfill has completed with the destruction of the tanks. As such, the gas-free certification did not take place prior to any tank removal commencing.
- Large amounts of rubble and mixed waste stockpiles were observed during the final external environmental audit. There is a dispute between the Contractors on this decommissioning project and those on the Dover House project as to who produced this waste. However, the auditor noted that some brick stockpiles appeared to originate from excavations related to the decommissioning project and had not been reported on in the initial ECO audit checklist.

- Windblown sand was observed on the sidewalk adjacent to the site, as well as on the adjacent road, Orange Street. This was found to originate from the sand used to backfill the tank area within the forecourt within the site boundaries.
- The holder is to ensure that the fence is removed following the finalisation of construction of the building.

All non-compliances identified in the ECO reports during the decommissioning phase were addressed and documented as closed out within the ECO reports. The post-decommissioning phase non-compliances were not noted within the ECO reports.

Non-compliances noted within the final external environmental audit should be closed out as soon as possible. The Auditor recommends the following:

- All rubble and construction waste that was left on site following the decommissioning phase should be removed and adequately disposed of.
- All exposed backfilled areas should have sufficient dust mitigation measures in place to prevent the further spread of sand onto the adjacent road and parking bays.
- Windblown sand on adjacent roadways that appear to have emanated from the site should be sufficiently cleaned.

The auditor notes that there are new developers on site who are now in control of the site. The applicant has advised that this developer will be responsible for cleaning the site once their works are complete.

Following the final environmental audit, the auditor will:

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

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

Table 6: General Audit Finding Observed on Site

Photographic Record of Findings on Site

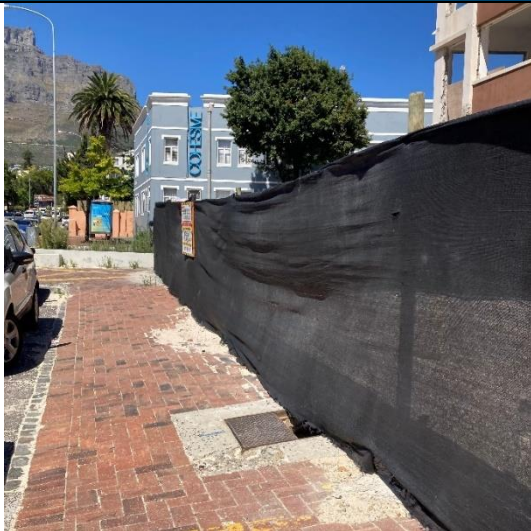


Figure 3: Fence screening off the site



Figure 4: Backfilled areas within the forecourt



Figure 5: Exposed sand from backfilling

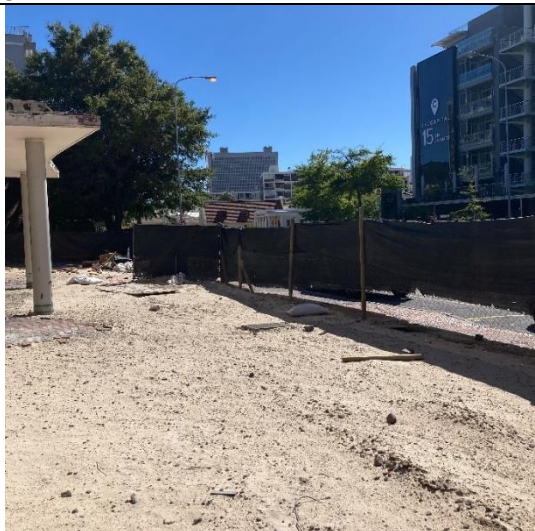


Figure 6: Backfilled areas within the forecourt

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

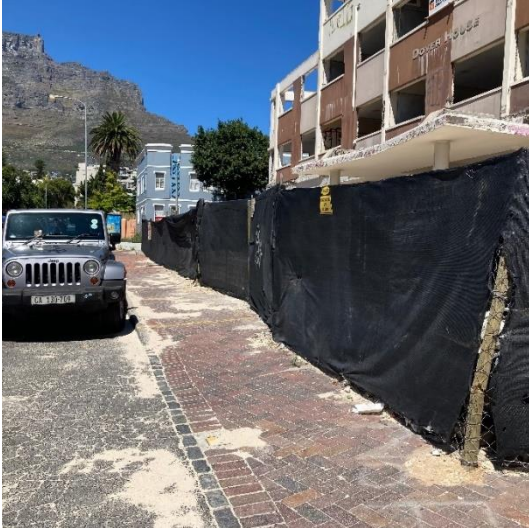


Figure 7: Sand from the site located on the adjacent road



Figure 8: Sand from the site located on the adjacent sidewalk



Figure 9: Stockpiles remaining on site

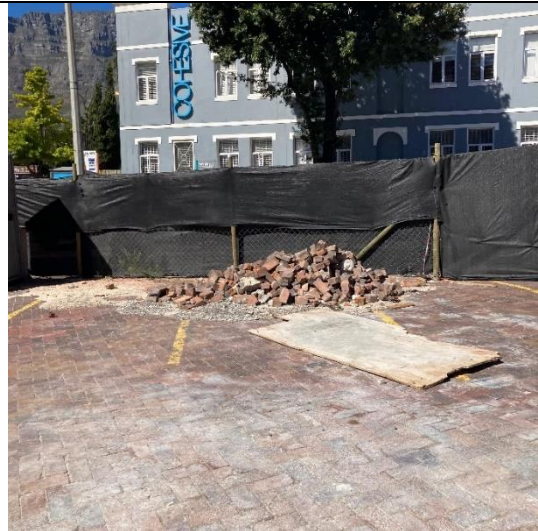


Figure 10: Bricks located on site



Figure 11: Mixed waste stockpiles located on site



Figure 12: Bricks and mixed waste remaining on site

4. CONCLUSION

4.1 Summary of Compliance

A high level of compliance was achieved during the final environmental audit. As mentioned in **Section 3.1** of this report, certain conditions would not be applicable at the time of the audit, while others may not have been assessed given that they may not have sufficient information available. The compliance levels achieved, according to the conditions within the EMPr and EA, is detailed in **Table 4** and **Table 5** above as well as **Figure 3** to **Figure 12**.

Non-compliances are noted within **Table 4** and **Table 5** as well as **Section 3.3**. Non-compliances for the decommissioning phase have been noted within the ECO reports and sufficiently closed out. Non-compliances were noted for the post-decommissioning rehabilitation phase, and minimal recommendations are made by the auditor. In order to remain compliant, the auditor recommends that the holder is to remove all remaining stockpiles and rubble that was left on site and to implement dust mitigation measures to prevent the spread of sand into surrounding areas.

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