
Environmental Management Audit Report NEMA EIA Regulation 34 Audit April 2026

Extension Of the Black River Canal Culvert for Road Widening Along Imam Haron Road, Claremont

Western Cape

DEA&DP Reference: 16/3/3/1/A2/16/3013/21

Final Report

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Prepared for:
City of Cape Town: Road Infrastructure Planning and Development

Executive Summary

Christine Rabie Environmental Management Solutions (CREMS) was appointed on behalf of the Environmental Authorisation Holder, City of Cape Town: Road Infrastructure Planning and Development, to undertake the first independent external environmental audit for the Extension Of the Black River Canal Culvert for Road Widening Along Imam Haron Road in accordance with Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), and Condition 15 of the Environmental Authorisation. The audit assessed compliance with the Environmental Authorisation and approved Environmental Management Programme (EMPr) during the current construction phase. The audit included a site inspection on 29 April 2026, interviews with relevant project representatives, and review of environmental records, monitoring reports and supporting documentation.

Overall Findings

The project was found to be operating at a **high standard of environmental management performance**, with clear evidence of active oversight, orderly site controls and constructive engagement by the project team.

Particular strengths observed during the audit included:

- Proactive and well-documented DEO and ECO involvement
- Strong environmental record keeping and reporting systems
- Responsive contractor management
- Overall effective control of environmental risks within the authorised work area
- No evidence of significant pollution, erosion, biodiversity harm or unresolved complaints during the audit period

Key Findings and Improvement Actions:

- The first external audit was completed significantly later than the prescribed three-month timeframe following commencement of construction. This was administrative in nature and has now been addressed through completion of the present audit.
- Two minor incidents relating to cement handling at the Black River Canal culvert were identified in the ECO reports during the audit period. These incidents created limited, localised potential for contamination of the canal and resulted in a finding of partial compliance with the relevant EMPr requirement. The issues were isolated in nature, were addressed at the time, and no evidence of lasting environmental impact was identified.
- As construction progresses toward completion, stabilising of the slope next to the culvert area against possible soil erosion should be the priority focus area.

EMPr Review

No material shortcomings were identified in the EMPr during this audit. The EMPr remains relevant, practical and suitable to guide environmental management during the construction phase. No formal amendment is recommended at this time.

Overall Conclusion

This audit reflects a project with **sound environmental systems and positive management commitment**. Good foundations in place for continued compliant delivery through the remainder of construction. Completion of works is imminent and final stabilisation of the area will ensure the site remains free of erosion and sedimentation risks and is appropriately prepared for closure.

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Abbreviations	
DEA&DP	Department of Environmental Affairs and Development Planning
DEO	(Contractor's) Designated Environmental Officer
EA	Environmental Authorisation (Ref: 16/3/3/1/A2/16/3013/21, issued on 5 October 2021)
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme (<i>Proposed Extension of the Black River Canal Culvert for Road Widening Along Imam Haron Road, Cape Town, The Environmental Partnership, June 2021</i>)
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act (No 107) of 1998
MS	Environmental Method Statement

Designations and Definitions
Auditor: The external independent environmental auditor, Mrs Christine Rabie, who undertook this audit.
Audit period: The time period for which compliance with the Environmental Authorisation and EMPr is assessed. This extends from the commencement of project activities on site, or from the date of the previous Reg 34 audit (whichever is later), up to and including the date of the current audit. The audit period, therefore, covers the review of records of environmental performance during this timeframe, and is not limited to conditions observed on the day of the audit inspection.
Contractor (Principal): Civils 2000
Contractor's Construction Manager/Site Agent: Mr Andre Hansen
(Contractor's) Designated Environmental Officer (DEO): Ms Katrina Michaels
EA Holder: City of Cape Town: Road Infrastructure Planning and Development

Environmental Control Officer (ECO): Taryn Brickhill and Olivia Thompson of Chand Consultants (Chand)
Evidence: Written records, physical evidence, observations, or oral statements obtained during interviews. Where possible, oral statements were corroborated by more than one independent party.
Engineer/client representative: Responsible for overseeing the contractual implementation of the works on behalf of the EA Holder.
Site/Development: Project site located at the extension of the Black River Canal culvert for road widening along Imam Haron Road, Cape Town, specifically the area that contains the activities authorised by the EA.

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions (CREMS) was appointed on behalf of the Environmental Authorisation (EA) Holder to undertake an independent external environmental audit of the project's compliance with the conditions of Environmental Authorisation Ref. 16/3/3/1/A2/16/3013/21, issued by the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) on 5 October 2021, together with the approved Environmental Management Programme (EMPr) for the project dated June 2021. This report constitutes the first external audit for the project.

The project entails (per the EA) the widening of the Black River canal culvert by 9 (nine) metres to accommodate the widening of Imam Haron Road. The widening takes place along the eastbound carriageway from the existing pedestrian walkway at the intersection with Oakfield Road, Claremont. The footprint is approximately 95m². Access is gained via Imam Haron Road, Claremont.



Figure 1: Site Development Plan (Figure sourced from the EA)

The broader roadworks contract commenced in March 2025. Construction of the Black River culvert works authorised by this EA commenced on 8 September 2025. **Civils 2000** was the principal contractor for the civil works phase being undertaken at the time of the audit.

At the time of the audit inspection, the works were largely complete. Access off Imam Haron Road is being utilised.

1.2 SCOPE AND TERMS OF REFERENCE

This audit and accompanying report have been prepared to fulfil the requirements for independent environmental audits in terms of Regulation 34 of the NEMA Environmental Impact Assessment Regulations, 2014 (as amended), read together with **Condition 15** of Environmental Authorisation Ref. 16/3/3/1/A2/16/3013/21.

The terms of reference for the audit were derived from these statutory requirements together with current professional best practice for environmental compliance audits of this nature.

1.2.1 EA requirements

Condition 15 of the EA requires independent audits of compliance with the EA and approved EMPr to be undertaken:

- within three (3) months of commencement of development activities; and
- within six (6) months of completion of construction activities.
- Every 5 years while the EA remains valid.

This report constitutes the first such audit.

1.2.2 NEMA EIA Regulation 34 Requirements

Regulation 34 requires the holder of an Environmental Authorisation to ensure that compliance with the conditions of the EA and EMPr is audited by an independent person with the relevant environmental auditing expertise, and that such audit reports are submitted to the competent authority at the intervals prescribed in the EA.

Appendix 7 of the EIA Regulations sets out the minimum required contents of an environmental audit report. Table 1 below cross-references those requirements to the relevant sections of this report.

Appendix 7 Requirement	Relevant section in this report
(1) Provide recommendations regarding the need to amend the EMPr;	Section 4
(2a) Report on the level of compliance with the conditions of the EA and the EMPr and the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr;	Section 3
(2b) Identify and assess any new impacts and risks as a result of undertaking the activity;	Section 4
(2c,d) Evaluate the effectiveness of the EMPr and any shortcomings;	Section 4
(2e) Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.	Section 4
(3.1 a) contain the details of the independent person who prepared the environmental audit report and their expertise;	Section 6
(3.1 b) declaration that the independent auditor is independent;	Section 6
(3.1 c) indication of the scope of, and the purpose for which, the environmental audit report was prepared;	Section 1
(3.1 d) description of the methodology adopted in preparing the audit report;	Section 2
(3.1 e) indication of the ability of the EMPr to sufficiently provide for the avoidance, management and mitigation of the environmental impacts associated with the undertaking of the activity on an ongoing basis and the closure of the facility and ensure compliance with the provisions of the EA and EMPr	Section 4

(3.1 f) a description of any assumptions made, and any uncertainties or gaps in knowledge;	Section 1.3
(3.1 g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;	Section 2
(3.1 h) summary and copies of any comments that were received during any consultation process; and	Not applicable - no consultation comments received
(3.1 i) any other information required by the competent authority.	EA Conditions described in section 1.2.1

1.2.3 Terms of reference for this audit

The terms of reference for this audit are as follows:

- Review the Environmental Authorisation, approved EMPr, ECO reports, and relevant supporting documentation prior to the audit.
- Prepare a project-specific compliance checklist based on applicable EA conditions and EMPr requirements.
- Conduct a site inspection and interview relevant project personnel and/or consultants.
- Review documentary evidence and site records to verify compliance during the audit period.
- Assess the adequacy, relevance and practical effectiveness of the EMPr for the current construction phase.
- Identify any material compliance gaps, emerging risks, or improvement opportunities.
- Prepare a draft audit report for factual review by relevant project representatives.
- Finalise the audit report for submission to the competent authority within the required timeframe.
- Recognise areas of good environmental management performance that can be maintained and built upon during the remainder of the project.

1.3 ASSUMPTIONS AND LIMITATIONS

Assumptions:

- The audit findings are based, in part, on information, explanations, records and documentation made available by the Environmental Authorisation Holder, project personnel, consultants and contractors.
- Unless there was reason to believe otherwise, such information has been accepted in good faith as materially accurate, complete and representative of the matters to which it relates.

Limitations:

- The audit was undertaken specifically in terms of Regulation 34 of the NEMA Environmental Impact Assessment Regulations, 2014 (as amended). It does not constitute a full legal compliance audit of all potentially applicable environmental legislation.
- The scope was limited to assessing compliance with the Environmental Authorisation conditions and approved EMPr requirements relevant to the project and to the phase of works active during the audit period.

- The audit period extends from the commencement of project activities, or the date of the previous external audit where applicable, up to the date of the present audit.
- The site inspection represents conditions observed at a specific point in time and cannot, on its own, verify all historic activities, temporary conditions, or undocumented incidents that may have occurred during the broader audit period.
- Findings were informed by site observations, interviews, records made available, and professional judgement. Where reasonably possible, documentary and physical evidence was cross-checked.
- The auditor cannot be held responsible for conclusions materially affected by inaccurate, incomplete, misleading, or withheld information not reasonably detectable during the course of the audit.
- This report has been prepared for the purposes stated herein and should be read as a whole. Isolated extracts may not reflect the full context of the findings.
- The identification of strengths or good practices during the audit should not be interpreted as assurance of universal compliance across all activities or all times.

2 METHODOLOGY

2.1 Approach

The applicable requirements of the Environmental Authorisation (EA) and approved Environmental Management Programme (EMPr) were extracted and incorporated into a project-specific audit checklist. These formed the basis of the compliance assessment presented in Section 3 of this report.

The site inspection component of the audit was undertaken on **29 April 2026** by the undersigned auditor, Christine Rabie, accompanied by ECO Ms Olivia Thompson and the Contractor's DEO Ms Katrina Michaels.

Documentary evidence reviewed during the audit, and/or made available by the ECO and project team, included the following:

- **Monthly ECO Environmental Compliance Reports:** Chand, March 2025 - March 2026. **IMPORTANT NOTE:** The ECO reports cover a larger contract area than just the construction works associated with the Black River culvert. This audit focuses on the compliance aspects reported that affect the EA authorised area, which is the extension of the culvert and directly supportive activities, and does not consider compliance issues/incidents clearly affecting other areas of the contract.
- **Environmental Authorisation:** 16/3/3/1/A2/16/3013/21, as issued by the Department of Environmental Affairs and Development Planning (DEA&DP) on 5 October 2021.
- **Environmental Management Programme:** (*Proposed Extension of the Black River Canal Culvert for Road Widening Along Imam Haron Road, Cape Town*, The Environmental Partnership, June 2021)
- **Environmental Method Statements ENV-MS1 to ENV-MS14**, January 2025.
- **Notification of Commencement**, Chand, 9 December 2024.
- **Notification of I&APs of the EA**, The Environmental Partnership, 13 October 2021.

Following completion of the site inspection, interviews and documentary review, each applicable EA condition and EMPr requirement was assessed and assigned a compliance status in accordance with the rating definitions provided in Section 3.

Recommendations were then developed with reference to:

- identified compliance gaps;
- emerging environmental risks;
- opportunities to strengthen environmental performance; and
- practical close-out actions for the remainder of the construction phase.

In addition to identifying gaps, the audit also recognised effective environmental controls and management practices already in place, to support continual improvement.

3 COMPLIANCE AUDIT

3.1 Compliance Rating Definitions

Compliant = The applicable requirement has been met, and no material adverse environmental impact or unmanaged risk was evident.

Compliance at Risk = The requirement is not currently breached, but circumstances indicate a credible risk of future non-compliance unless proactive management action is taken.

Not Applicable/Not Yet Required = not currently applicable due to project phase, scope, or timing.

Non-Compliant = The applicable requirement has not been met, or evidence indicates a material breach.

Noted = where a condition of the EA/EMPr is not related to a specific action required of the project team, but rather a general statement.

Partially Compliant = The requirement has been met in part, but additional action is necessary to achieve full compliance.

Note: Where partial compliance results in significant environmental impact, damage, or legal liability, the finding will be categorised as Non-Compliance.

Unverified = where there is no visual or documentary evidence available to verify compliance/ non-compliance.

3.2 Compliance Audit Findings:

3.2.1 Compliance with the Conditions of the Environmental Authorisation

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
1.	The holder is authorised to undertake the listed activities specified in Section B of the EA in accordance with, and restricted to, the preferred alternative , described in the BAR dated June 2021 on the site as described in Section C of the EA.	COMPLIANT	The works on site are consistent with the authorised development description and location.
2.	Authorisation of the activity is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure 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.	COMPLIANT	The appointed ECO acts as the client agent to monitor and confirm that the EA and EMPr are being complied with by all persons on site.
3.	The holder must commence with, and conclude, the listed activity 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.(a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activity; and(b) A period of ten (10) years, from the date the holder commenced with an authorised listed activity, during which period the authorised listed activity, must be concluded.	COMPLIANT	Construction on the culvert commenced on 8 September 2025. This is within the validity period of the EA.
4.	The activity that has been authorised must only be carried out at the site described in Section C of the EA in terms of the approved “Environmental Management Programme” (“EMPr”).	COMPLIANT	The works have been undertaken in the authorised location.
5.	Any changes to, or deviations from the scope of the description set out in Section B and Condition 2 above must be 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 such information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	N/A	No changes were made to the EA-approved scope.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
6.	The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision –6.1 notify all registered Interested and Affected Parties of –6.1.1 the outcome of the application;6.1.2 the reasons for the decision; 6.1.3 the date of the decision; and 6.1.4 the date of issue of the decision;6.2 draw the attention of all registered Interested and Affected Parties to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended);6.3 draw the attention of all registered Interested and Affected Parties to the manner in which they may access the decision; and 6.4 provide the registered Interested and Affected Parties with: 6.4.1 the name of the holder (entity) of 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 address, if any; and 6.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered Interested and Affected Parties in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).	COMPLIANT	Notification of Environmental Authorisation was undertaken by the Environmental Partnership on 13 October 2021 (as evidenced by documents provided).
7.	The listed activity, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered Interested and Affected Parties of this decision.	COMPLIANT	Activities commenced after the 20-day period had concluded.
8.	In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the activity, including site preparation, until such time as the appeal has been finalised and the holder is authorised to do so.	N/A	No appeals were lodged.
9.	A minimum of 7 (seven) calendar days' notice , in writing, must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation.9.1 The notice must make clear reference to the site details and EIA Reference number given above.9.2 The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7 and 14.	COMPLIANT	Notification of commencement was submitted to the DEA&DP by Chand on 9 December 2024. The required information and supporting proofs were included in the notification.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
10.	The draft EMPr (dated June 2021) submitted as part of the application for Environmental Authorisation is herewith approved and must be implemented.	COMPLIANT	The project EMPr is being implemented, as confirmed by this audit report.
11.	The EMPr must be included in all contract documentation for all phases of implementation.	COMPLIANT	A C1.6 Protection of the Environment Declaration, which forms part of the contract documentation, has been signed and is in the environmental site file.
12.	An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.	N/A	No EMPr amendments have been sought or are required.
13.	A copy of the Environmental Authorisation and the EMPr must be kept at the site where the listed activity will be undertaken. Access to the site referred to in Section C of the EA must be granted and, the Environmental Authorisation and EMPr 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. The Environmental Authorisation and EMPr must be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site.	COMPLIANT	The EA, EMPr and compliance monitoring reports were confirmed in the site file.
14.	The holder must appoint a suitably experienced Environment Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation.14.1 be appointed prior to commencement of any land clearing or construction activities commencing;14.2 ensure compliance with the EMPr and the conditions contained herein;14.3 keep record of all activities on site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO; and14.4 provide the competent authority with copies of the ECO reports within 30 days of the project being finalised.	COMPLIANT	Chand has been appointed as the ECO, for the duration of construction activities to date, as evidenced by the Notification of Commencement (9 December 2024) and the ECO reports provided.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
15.	The holder must, for the period during which the Environmental Authorisation and EMPr remain valid –15.1 ensure that the compliance with the conditions of the Environmental Authorisation and the EMPr is audited;15.2 submit at least two environmental audit reports to the relevant competent authority during the construction phase. The holder must submit the first audit report within three (3) months after commencement of the construction phase and another audit report within six (6) months after completion of the construction period; and 15.3 submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.	PARTIALLY COMPLIANT	The first Environmental Audit, as required by this condition, has been undertaken, as evidenced by this report. Construction of the Black River Culvert commenced on 8 September 2025, as confirmed by the ECO. Accordingly, the first audit was required within three (3) months of commencement, i.e. by 8 December 2025. The audit was undertaken on 29 April 2026, approximately 4 months and 3 weeks after the prescribed deadline. Accordingly, while the audit requirement has now been fulfilled, the timing requirement was not met, and the finding is therefore rated Partially Compliant. RECOMMENDATION: a) Ensure that external audit reports are undertaken within the time frames required by EA condition 15. The next audit is required within six (6) months after completion of the construction period.
16.	The environmental audit report must be prepared by an independent person and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended).16.1 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 extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;16.2 identify and assess any new impacts and risks as a result of undertaking the activity; 16.3 evaluate the effectiveness of the EMPr; 16.4 identify shortcomings in the EMPr; 16.5 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 16.6 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; 16.7 include a photographic record of the site applicable to the audit; and 16.8 be informed by the ECO reports.	COMPLIANT	This audit report is compliant with the requirements, as confirmed by the table in section 1.2.2 of this audit report.

AUDIT ITEM/ EA Condition	CONDITION	COMPLIANCE	COMMENTS
17.	The holder must, within 7 (seven) calendar days of the submission of the environmental audit report to the competent authority, notify all potential and registered Interested and Affected Parties of the submission and make the report available to anyone on request and, where the holder has such a facility, be placed on a publicly accessible website.	UNVERIFIED	The requirement to notify registered and potential Interested and Affected Parties within seven (7) days of submission of the report becomes applicable upon submission of this final report and was not assessable at the time of audit.
18.	Surface and ground water 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.	COMPLIANT	No issues related to surface and groundwater pollution because of the contract activities were observed or reported.
19.	An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation.	COMPLIANT	Confirmed on site, and in the waste disposal records viewed.
20.	Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape ("HWC"). A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	COMPLIANT	No heritage remains were reported uncovered during the audit period.

3.2.2 Compliance with the Requirements of the Environmental Management Programme

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
NOTE: This audit section is principally concerned with the development's compliance in achieving the required EMPr <u>Outcomes/Objectives</u> , highlighted in bold text under the specification section, though comment is also made regarding the implementation of the related <u>Actions/Methods</u> as set out in the EMPr (not all listed in detail in this checklist). It is noted that actions/methods in the EMPr may be amended by the project team as required to practically and effectively achieve the required Outcomes, but EMPr Outcomes cannot be amended without following a formal EMPr Amendment and DEA&DP approval process.				
INSTITUTIONAL AND ADMINISTRATIVE REQUIREMENTS				
1.	2.1.1	Contractual commitment - EMP forms part of the contract documents	COMPLIANT	A C1.6 Protection of the Environment Declaration, which forms part of the contract documentation, has been signed and is in the environmental site file. This clearly references and requires the implementation of the EMPr and fines for non-compliance.
2.	2.3.20	Environmental awareness training has been undertaken	COMPLIANT	Awareness training has been undertaken as evidenced by the attendance registers in the environmental site file.
3.	2.4	Method Statements in place as required: - Site establishment - Dust management - Management of contaminated water - Hazardous substances - Waste management - Water wastage, management and pollution prevention - Cement and concrete handling - Traffic management - Work within the Black River canal	COMPLIANT	Method Statements are in place.
4.	2.6	ECO appointed for the duration of the construction phase, including responsibility for: - Average weekly inspections by the ECO - Weekly site inspection checklist; Monthly ECO reports	COMPLIANT	Chand has been appointed as ECO and is undertaking the required duties. ECO oversight is proactive and well-documented. Weekly inspections are undertaken with a weekly inspection checklist generated. Monthly ECO reports were issued. Copies of the ECO compliance reports for March 2025 – March 2026 were provided to the auditor.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
CONSTRUCTION SPECIFICATIONS				
5.	2.3.1	Limit impacts on water quality and vegetation - Prevent sediment and cement pollution entering canal - Remove waste material from canal - Locate stockpiles away from watercourse - Avoid in-channel works during heavy rainfall or high flows	COMPLIANT	The culvert widening works were substantially complete at the time of the audit inspection. No evidence of sedimentation, waste accumulation, erosion, contamination or vegetation impacts associated with the Black River Canal were observed. ECO reports recorded generally effective implementation of water quality protection measures throughout the audit period. An incident of white paint running through stormwater pipes into the culvert was recorded on 10 October 2025. This was immediately investigated and found not to be attributable to the contractor's activities.
6.	2.3.2	Manage waste generation impacts - Implement waste minimisation and recycling - Provide suitable waste bins and storage - Dispose of waste at licensed facilities - Separate hazardous and non-hazardous waste - Provide and maintain chemical toilets	COMPLIANT	Waste management systems, waste storage facilities, chemical toilets and waste removal arrangements were reported to be generally maintained throughout the construction period. No waste-related impacts to the Black River Canal were identified.
7.	2.3.3	Reduce congestion from construction vehicles - Implement traffic accommodation planning - Erect warning signage - Station flagmen near works	COMPLIANT	Traffic accommodation measures, signage and traffic management controls were implemented. Barricading was in place between the road and the canal work site. No significant traffic-related environmental non-conformances were identified.
8.	2.3.4	Reduce visual impacts - Screen site camp and stockpiles - Maintain clean and tidy site - Implement dust and litter control	COMPLIANT	No significant visual impacts associated with the culvert works were observed during the audit inspection, the area was clean and tidy. (Several periodic minor issues related to the litter/housekeeping on site were recorded in the ECO reports for other areas outside of and not affecting the Black River culvert works, and were excluded from this finding).
9.	2.3.5	Minimise noise impacts - Restrict works to normal hours - Maintain machinery - Provide hearing protection	COMPLIANT	No significant noise-related complaints or non-conformances were recorded. Construction activities generally remained within normal working hours.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
10.	2.3.6	Limit dust impacts - Cover loads and stockpiles - Implement dust suppression measures - Use dust screening where required	COMPLIANT	No dust issues were observed on site or reported for the work area, which has a relatively small footprint.
11.	2.3.7	Limit vibration impacts - Restrict works to normal hours - Enforce low site speed limits	COMPLIANT	No vibration-related complaints or non-conformances were identified on site or in the ECO records reviewed.
12.	2.3.8	Promote temporary employment creation - Prioritise local subcontractors and labourers	UNVERIFIED	No documentary evidence was made available to verify the extent to which local labour and subcontractors were prioritised.
13.	2.3.9	Manage material handling impacts - Store fuels and cement appropriately - Maintain spill kits on site - Handle materials in accordance with MSDS requirements	COMPLIANT	Spill kits, formalised hazardous substance storage and MSDS controls were observed to be implemented. No issues related to the culvert work activities were observed or reported.
14.	2.3.10	Delineate no-go and working areas - Demarcate working and no-go areas - Prevent dumping and stockpiling in no-go areas - Submit Method Statements to ECO	COMPLIANT	Work areas and site boundaries were appropriately demarcated and managed (traffic barricades, ready fence, shade cloth and netting in relevant areas). No issues regarding encroachments into no-go areas were reported by the ECO.
15.	2.3.11	Manage site camp establishment - Locate camp in consultation with ECO - Screen and maintain site camp - Comply with Occupational Health and Safety requirements	COMPLIANT	Site camp and laydown area establishments and screening were noted to be in acceptable order.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
16.	2.3.12	Control eating areas on site - Restrict eating to designated areas - Provide refuse bins and ablutions	COMPLIANT	Designated eating areas, refuse bins and ablution facilities were generally appropriately managed, at the laydown area near the culvert works and at the main site camp servicing the greater contract.
17.	2.3.13	Manage clearing and stabilisation - Stabilise exposed areas - Limit vegetation clearing - Manage stockpiles to prevent erosion	COMPLIANT	The disturbance footprint is limited, and no issues regarding erosion of the slope next to the culvert site were observed or reported during the reporting period. The ECO and DEO reported that sandbags had been used to stabilise the slope and work area when required. Final stabilisation of exposed soils should nevertheless be completed on conclusion of the works to minimise future erosion risk.
18.	2.3.14	Manage equipment and machinery impacts - Repair leaks immediately - Use drip trays - Dispose of hazardous waste appropriately	COMPLIANT	No negative impacts related to leaks/spills from machinery were observed or reported for the culvert work site. (Several, mostly minor, issues related to oil/fuel spills and inconsistent use of drip trays on site were recorded in the ECO reports for other areas outside of and not affecting the Black River culvert works and were excluded from this finding).
19.	2.3.15	Manage cement batching impacts - Use ready-mix concrete where possible - Prevent contaminated runoff - Dispose of cement waste appropriately	PARTIALLY COMPLIANT	No cement contamination or risk was observed during the audit inspection. However, two relatively minor incidents were recorded in the ECO reports: October 2025 – a wheelbarrow used to remove excess concrete adjacent to the Black River Canal was placed within the water and some concrete was observed falling into the water. March 2026 - cement residue observed overspilling from a small board onto the floor of the culvert. Therefore, this audit item is rated partially compliant for the audit period.
20.	2.3.16	Manage equipment servicing and cleaning - Maintain equipment in good condition - Undertake servicing off-site where possible	COMPLIANT	No servicing at the work site or issues regarding equipment condition were recorded.
21.	2.3.17	Maintain cleanliness of public roads - Prevent overloading of vehicles - Sweep roads and verges daily	COMPLIANT	The road and verge next to the site was noted to be in a clean condition, and no significant issues were reported in the ECO reports.

ITEM	EMPR REF	SPECIFICATION	COMPLIANCE	COMMENTS
22.	2.3.18	Implement emergency procedures and spill response - Comply with Sections 30 and 30A of NEMA - Report incidents and spills - Maintain first aid kits and spill response equipment	COMPLIANT	A spill kit is available on site. No spills related to the contractor's activities at the culvert work site were recorded. A hydraulic spill from an externally hired excavator was recorded at the main site camp on 23 February 2026 and was satisfactorily addressed. First aid kits/response are implemented and audited through the Health& Safety system.
23.	2.3.19	Maintain safety on site - Implement the Occupational Health and Safety Act - Wearing of PPE	COMPLIANT	PPE use, traffic safety controls and general OHS implementation appeared satisfactory during the audit inspection. These are implemented and audited through the Health& Safety system.
24.	2.5	Site clean-up and rehabilitation undertaken as required - Repair of damages - Site clean-up at the end of construction work	NOT YET REQUIRED	The work on the culvert was substantially complete at the time of the audit. On completion, the adjacent open soil area will need to be left in a stable condition to ensure that there are no soil erosion risks. RECOMMENDATION a) The ECO is to inspect the work area around the culvert construction on completion and confirm that all wastes and excess materials have been removed and that the soils are stabilised such that there is no risk of erosion and sedimentation of the canal. This is to be specifically checked and reported on in the post-closure external audit.

4 EMPr REVIEW

4.1 Scope of the EMPr review

This review was limited to those portions of the EMPr relevant to the current audit period, namely the construction-phase requirements contained in Section 4 of the EMPr.

4.2 Relevance/shortcomings of the EMPr

No material shortcomings were identified in the content of the EMPr during this audit. The EMPr remains relevant, practical and generally adequate to manage the environmental risks associated with the current construction phase of the project.

4.3 Recommendations for EMPr amendment

No formal amendment to the EMPr is recommended at this time. Minor implementation improvements identified during the audit can be addressed through normal site management and ECO follow-up without requiring amendment of the approved EMPr.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This construction-phase audit of compliance with the Environmental Authorisation (EA) and Environmental Management Programme (EMPr) found a generally high standard of environmental management implementation, both administratively and physically on site. Consistent ECO oversight, comprehensive reporting and record keeping were evident, together with a supportive client team and a proactive, engaged contractor. No serious non-compliances, environmental damage or pollution were identified. The following compliance findings were, however, recorded:

- **1 partial compliance with the conditions of the EA** relating to the first external audit being completed outside the prescribed three-month period following commencement of construction. This was administrative in nature and did not result in environmental harm. The matter is effectively closed out through completion of the present audit.
- **1 partial compliance with the conditions of the EA** relating to cement use at the Black River culvert, which was inadequately controlled on two occasions, relating to minor, short-term and localised potential for water contamination within the canal.

The EMPr remains adequate to manage the environmental risks associated with the construction phase, and no amendment to the EMPr is recommended at this stage.

The following recommendations arose from the audit:

- a) Ensure that external audit reports are undertaken within the time frames required by EA condition 15. The next audit is required within six (6) months after completion of the construction period.
- b) The ECO is to inspect the work area around the culvert construction on completion and confirm that all wastes and excess materials have been removed and that the soils are stabilised such that there is no risk of erosion and sedimentation of the canal. This is to be specifically checked and reported on in the post-closure external audit.

Note: It remains the responsibility of the EA Holder or its appointed agents to notify all potential and registered Interested and Affected Parties within seven (7) days of submission of this report to DEA&DP, and to make the report available on request.

Overall, the audit indicates a project demonstrating sound environmental controls and positive management commitment.

6 DECLARATIONS & CREDENTIALS OF THE INDEPENDENT AUDITOR

I, the undersigned independent auditor, declare that I am independent of the project and suitably qualified to undertake this audit. Every reasonable effort has been made to conduct the audit in a thorough, professional, objective and fair manner.



Signed: **Christine M.M Rabie**

Date: **23 July 2026**

| B.Tech Environmental Management

| National Diploma: Landscape Technology

| Registered Professional Natural Scientist (Environmental Science), South African Council for Natural Scientific Professions Reg. No. 400055/17

| More than 20 years' directly relevant experience in environmental compliance auditing, ECO monitoring and environmental management

7 APPENDICES:

7.1 AUDIT PHOTO SHEET

The following photographs provide a visual record of site conditions during the audit inspection.

PHOTO 1: Signed Protection of the Environment Declaration

PHOTO 2: Example environmental induction attendance register (April 2026)

PHOTO 3: Contractor's DEO monthly environmental inspection checklist

PHOTO 4: EA is in the site file

PROPOSED EXTENSION OF THE BLACK RIVER CANAL CULVERT FOR ROAD WIDENING ALONG IMAM HARON ROAD, CAPE TOWN

ENVIRONMENTAL MANAGEMENT PROGRAMME

PREPARED FOR
CITY OF CAPE TOWN
STAD KAAPSTAD

City of Cape Town

ON BEHALF OF
SMC
Member of the Sotbana Group
SMC South Africa

PREPARED BY
The Environmental Partnership

JUNE 2021

THE ENVIRONMENTAL PARTNERSHIP
ENVIRONMENTAL CONSULTANTS

P O Box 945, Cape Town 8000
56 Shortmarket Street, Cape Town
www.enviropart.co.za

T: 021 422 0999
F: 021 422 0998
info@enviropart.co.za

PHOTO 5: EMPr is in the site file

CIVILS 2000 Group

LEGAL APPOINTMENT

Document No.: SHE-CO-APP-041
Date: 01/04/2024
Rev. No.: 1

To assist the employer in terms of all applicable environmental legislation and the Civils 2000 Group SHEQ Management System, you are hereby appointed as the Environmental Officer at STANHOPE project site.

FUNCTIONS OF AN ENVIRONMENTAL OFFICER

As an Environmental Officer for your area of designation, your functions include, but will not be limited to:

- Ensure that all company procedures regarding environmental control, along with the applicable legislative requirements and any specific client requirements, are implemented and adhered to.
- Ensure that appropriate measures are taken to limit any form of environmental damage.
- Ensure that all reasonable steps are taken to prevent noise, air, soil, and water pollution from the work activities.
- Ensure that workers in hazardous environments are made aware of the potential hazards and the necessary precautions.
- Ensure that in specific situations, environmental method statements are conducted and adhered to.
- Ensure that work activities conducted do not interfere with local communities or other external bodies.
- Ensure that all relevant warning and information signs pertaining to environmental control are erected and maintained.
- Ensure that a formal environmental inspection is conducted on a monthly basis and that the findings are recorded onto a register and reported to senior management.

You acknowledge that you are sufficiently trained, qualified, and skilled to carry out your responsibilities as set out in this letter of appointment. In the event that you require any further training, information, or instruction, you are required to request such training, information, or instruction immediately.

DESIGNATION

I, ANDRE HANSEN do hereby appoint you KATEINA as the **Environmental Officer** for the site: STANHOPE for the duration of the project / contract or until you are relocated to another site / project or leave the employ of the company.

Signature [Signature] Designation S.I Date 2/4/25

ACCEPTANCE OF APPOINTMENT

I KATEINA do hereby accept this designation and acknowledge that I understand the requirements of this appointment.

Signature [Signature] Designation: Environmental Officer Date 2/4/25

PHOTO 6: Appointment of Contractor's Designated Environmental Officer

VISSERSHOK
WASTE MANAGEMENT FACILITY

VISSERSHOK WMF WEIGHBRIDGE SLIP

Customer Copy

Date	2028-03-03	Operator In	Clayton Solomon	Operator Out	Clayton Solomon
Vehicle Reg.	CAW424-198	Manual Manifest Number	0001009238	Manifest Number	0001009238
Customer	OMEGA SHOP	Vehicle Manifest Number		Waste Class/Function	Non Hazardous
Bin #				WIR Class	
Waste Type	GENERAL WASTE			WIR Number	
Treatment	CD				
Gross Mass	13100.00	Tare Mass	12080	Net Mass	1020 kg
Time In	2028-03-03 12:37:04	Time Out	2028-03-03 13:01:53		
Customer Name		Signature			

VISSERSHOK
WASTE MANAGEMENT FACILITY

VISSERSHOK WMF WEIGHBRIDGE SLIP

Transporter Copy

Date	2028-03-03	Operator In	Clayton Solomon	Operator Out	Clayton Solomon
Vehicle Reg.	CAW424-198	Manual Manifest Number	0001009238	Manifest Number	0001009238
Customer	OMEGA SHOP	Vehicle Manifest Number		WIR Class	
Bin #				WIR Number	
Waste Type	GENERAL WASTE				
Treatment	CD				
Gross Mass	13100.00	Tare Mass	12080	Net Mass	1020 kg
Time In	2028-03-03 12:37:04	Time Out	2028-03-03 13:01:53		
Customer Name		Signature			

PHOTO 7: Example of waste disposal slip in file

Loosonline T/A Econoloo reg. 2015/251464/07

Postal Address: PO Box 51200, Claremont 7742
Physical Address: 26 Railway Rd, Montague Gardens, Cape Town
Email: info@econoloo.com
Tel: 021 551 1009
Branch: Cape Town

Econ-O-Loo

Date: 23 Apr 26 15:43 Team: Vuyo Service Report: 719159
Customer: Civils 2000 (Pty) Ltd Signed by: [Signature]
Address: STA410 - Stanhope Road 11 Imam Haron Rd 11 Imam Haron Road
CLAREMONT

Remarks: No sig
Please retain slip as proof of safe disposal of liquid waste. Econoloo standard terms of service apply. Copy available on request. Products hired at hire's risk.

Project	Service	Qty	Unit	Rate	Total
STA410 - Stanhope Road	Flush	9	5		9
STA410 - Stanhope Road	Service	1	1	0.25	1
STA410 - Stanhope Road	Service	3	3		3
Total					13 0.25 13

PHOTO 8: Example portable toilet service record in file



PHOTO 9: Completed culvert extension looking towards Imam Haron Road



PHOTO 10: Culvert clean and clear



PHOTO 11: Culvert work site is clean and controlled. No stockpiling next to the culvert.



PHOTO 12: Controlled access/traffic management to work site and satellite laydown/facilities area.



PHOTO 13: Drip tray in use



PHOTO 14: Satellite laydown/facilities area near the culvert work site. General waste bins, drinking/wash water and toilet facilities are provided.

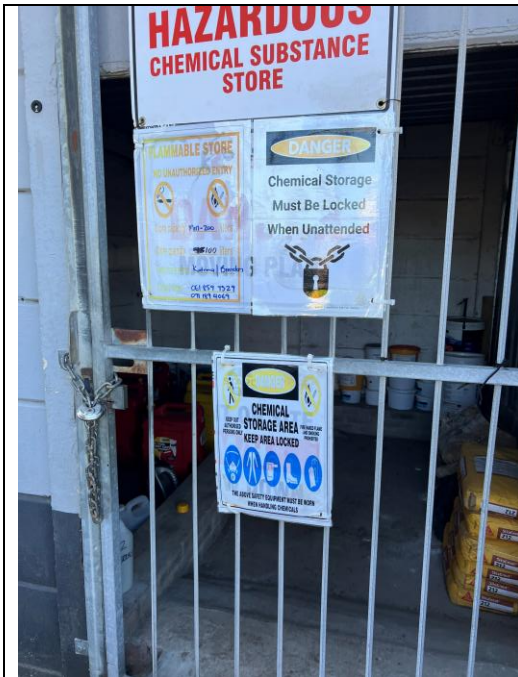


PHOTO 15: HCS store at the main site camp (which services the larger construction contract area)



PHOTO 16: Bunding at the HCS store at the main site camp



PHOTO 17: Eating area at the main site camp



PHOTO 18: Skip and bin at the main site camp



PHOTO 19: HCS storage and spill kit at the main site camp



PHOTO 20: Toilets at the main site camp