

***The Cliff Path Action Group***

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**ENVIRONMENTAL MANAGEMENT AUDIT –  
DEVELOPMENTN OF A FORMALISED PEDESTRIAN  
PATHWAY CONNECTING TO THE EXISTING  
HERMANUS CLIFF PATH VIA POOLE’S BAY,  
HERMANUS**



**Audit Date:** 7 May 2024  
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**HERMANUS CLIFF PATH  
DEVELOPMENT OF A FORMALISED PEDESTRIAN PATHWAY:  
EXTERNAL AUDIT REPORT**

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# **THE CLIFF PATH ACTION GROUP ENVIRONMENTAL MANAGEMENT AUDIT REPORT: DEVELOPMENT OF A FORMALISED PEDESTRIAN PATHWAY**

**DATE OF AUDIT: 7 May 2024**

Prepared by: W Nel

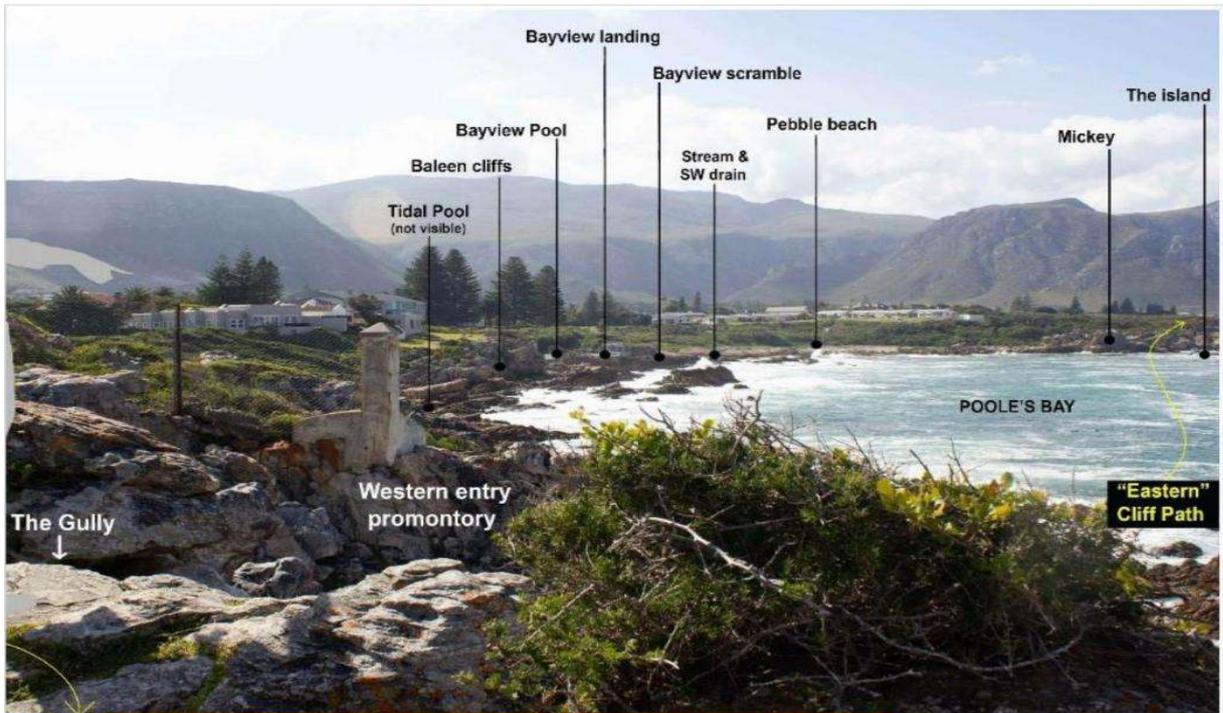
## **INTRODUCTION**

W Nel Environmental Consulting Services (WNECS) was appointed by the Cliff Path Action Group and AVDM Consulting Engineers to undertake an external environmental audits of the construction phase of the development of a formalized pedestrian path to connect to the existing Hermanus Cliff Path via Poole's Bay.

The path is to be built just below the high-watermark (HWM) in Poole's Bay, with an appearance similar to the existing Hermanus Cliff path appearance. The path would accommodate the landscape through elevated, flat and stepped sections, and the design would allow sea water to flow back and under the path. Elevated sections with balustrades (where required) would facilitate movement across these areas (tidal pool, Baleen cliffs, Bayview pool, Bayview scramble). Boardwalks are proposed for traversing the wetland below Erf 12257 before the tidal pool and another small wetland below Erf 1249 by the pebble beach.

Most of the path would be built with concrete, finished with a rough aggregate, to encourage staining and seaweed/mussel shell growth.

Figure 1 below includes landmarks in the area for reference.



**Figure 1: Most prominent landmarks along the proposed path.**

Figure 2 Includes a Site Layout Plan showing the various level, stepped and elevated sections



**Figure 2: Site Layout Plan of the Cliff path Development.**

The environmental authorisation (EA) for the project was issued on the 17<sup>th</sup> of November 2022 by the Department of Environmental Affairs and Development Planning (DEA&DP) and construction commenced on the site in early 2024..

The EMP (as required to be implemented by the EA) guides and governs environmental management on the site, dealing with aspects of the project and surrounding natural environment. These require management in order to maintain the quality of the natural and man-made environment, as well as activities on site in order to minimise or mitigate negative impacts. While the EMP is considered to be a guideline document assisting in how these aspects should be managed in the long term, it should be seen as open-ended, requiring regular review and updating in order for it to remain relevant to the requirements of the site and the environment.

To this end the EMP requires regular independent auditing of the environmental management system on the site. It is a requirement of the Environmental Authorisation that the holder of the EA undertake an independent environmental audit within three months of the commencement of the activity and on completion. These reports need to be submitted to the Competent Authority upon completion thereof.

This is therefore essentially an audit of the development's level of compliance with the current requirements of the EMP and EA for the construction period and general environmental management practices on site. The observations and findings aim to identify issues requiring further attention, or specifications/requirements of the EMP, that were not adhered to.

## **SCOPE**

This audit, and related report, fulfils the requirements for external environmental audits as detailed in the EMP and EA. The terms of reference for the audit were developed from these requirements as well as from current best management practice for environmental audits of this nature.

### ***EMP Requirements:***

The specific requirements for environmental audits are stipulated in Chapter 2 of the EMP:

The EMP Chapter 2 requires that a Compliance Audit Report be submitted to the Department of Environmental Affairs and Development Planning (DEA&D) within 3 months of commencement of the activity and upon completion of the construction phase. The Audit report must include proof of compliance with all the conditions of the EA as well as a description of the general state of the site, with specific reference to sensitive areas and areas of non-compliance. The auditor is to suggest corrective measures to limit the occurrence of the non-compliance incidents.

### ***Terms of Reference:***

The terms of reference for this audit as determined by WNECS were:

- Undertake a site inspection/s to assess the degree of compliance or non-compliance that has been implemented during the audited period of operation of the development.
- During the audit process key individuals/bodies involved with the management of the project or aspects thereof are to be given the opportunity to comment on issues being audited and where possible, will be invited to accompany the auditor to the relevant areas of inspection.
- Obtain evidence of compliance or non-compliance and corroborate both verbal and physical

evidence where possible.

- Review the EMP in light of regulatory and operational changes, current management practices and compliance shortfalls and recommend amendments to the EMP where appropriate.
- Compile a draft report for comment to the Holder of the EA.
- Compile a final report presenting the findings and submit a copy to the Holder of the EA and Competent Authority.

### ***Assumptions and Limitations:***

Assumptions made for this audit are:

- That all information received from the client and their representatives is accurate and correct.

Limitations are:

- This is not a Legal Compliance Audit (compliance with all environmental legislation). The audit is restricted to requirements of the EA and EMP documents applicable to this project.
- The audit inspection observes a moment in time and cannot verify the management of all activities or record all contraventions/issues.
- The environmental audit findings and conclusions are based solely upon the observations of the auditor and information provided to the auditor by interviewed parties. Wherever possible, verification in terms of visual inspection or examination of supporting documentation was used to confirm information provided. The auditor cannot be held responsible for findings and conclusions which resulted from inaccurate information, information being withheld from the auditor or which were not available during the course of the audit.

## **METHODOLOGY**

The auditor identified various environmental management measures, procedures and requirements from the EMP and EA which have been investigated and assessed during the audit. These requirements have been tabulated in the Checklist below.

The audit inspection was undertaken on the 7<sup>th</sup> May 2024 by Werner Nel (WNECS), accompanied by Mr Andre van der Merwe and Mr Jaco Rabe, representing the Client.

Documentation consulted for the purposes of this audit included:

- Environmental Authorisation;
- Site Specific EMP

The Audit Checklist was completed during the inspection and interviews, where compliance with each environmental management requirement was assessed and classified.

### ***Notes and Key to Compliance Columns:***

**TNC = Technical non-compliance** = where a specification or condition of the EMP or EA has not been complied with but there is no evidence of or potential for any significant environmental impact or damage as a result of the non-compliance.

**MNC = Material non-compliance** = where a specification or condition of the EMP or EA has not been complied with and there is evidence of/high potential for significant environmental impact or damage as a result of the non-compliance.

**TPC = Technical partial-compliance** = where a specification or condition of the EMP or RoD has been complied with in part and some management/administration practice addition/amendment is required but there is no evidence of or potential for significant environmental impact or damage as a result of the partial-compliance.

**MPC = Material partial-compliance** = where a specification or condition of the EMP or EA has been complied with in part and some management/administration practice addition/amendment is required and there is evidence of/potential for significant environmental impact or damage as a result of the partial-compliance.

**Compliance** = where a specification or condition of the EMP or EA has been complied with and there is no evidence of significant environmental impact or damage, or where impact was expected, that the required mitigation actions were undertaken to address such impact or damage.

## FINDINGS

### ***Part 1: Environmental Authorisation compliance (conditions applicable to the Construction Phase only):***

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
<b>E.</b>	<b>EA Conditions (some conditions have been included under relevant sections below)</b>					
<b>1</b>		The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the preferred alternative described in the BAR received on 4 August 2022 on the site as described in Section C above.	X			The site is located on the approved footprint as per the EA.
<b>2</b>		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	X			The EA was granted in 2022 and construction commenced in 2024.

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		<p>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 activities.</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 activities, must be concluded</p>				
3		The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.	X			All contractors and sub-contractors are aware of the requirements.
4		Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.				N/A – No deviations were implemented to date.
5		<p><b>Written notice to the Competent Authority</b></p> <p>A minimum of 7 (seven) calendar days' notice, in writing, must be given to the Competent Authority before commencement of development activities.</p> <p>5.1 The notice must make clear reference to the site details and EIA Reference number given above.</p> <p>5.2 The notice must also include proof of</p>	X			Notification was sent to the Competent Authority prior to commencement of construction.

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		<p>compliance with the following conditions described herein:</p> <p>Conditions: 6, 7, 11 and 18.</p>				
6		<p><b>Notification and administration of appeal</b></p> <p>The holder must in writing, within 14 (fourteen) calendar days of the date of this decision–</p> <p>6.1.notify all registered Interested and Affected Parties (“I&amp;APs”) of –</p> <p>6.1.1. the outcome of the application;</p> <p>6.1.2. the reasons for the decision as included in Annexure 3;</p> <p>6.1.3. the date of the decision; and</p> <p>6.1.4. the date when the decision was issued.</p> <p>6.2. draw the attention of all registered I&amp;APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2014 detailed in Section F below;</p> <p>6.3. draw the attention of all registered I&amp;APs to the manner in which they may access the decision;</p> <p>6.4. provide the registered I&amp;APs with:</p> <p>6.4.1. the name of the holder (entity) of this Environmental Authorisation,</p> <p>6.4.2. name of the responsible person for this Environmental Authorisation,</p> <p>6.4.3. postal address of the holder,</p> <p>6.4.4. telephonic and fax details of the holder,</p> <p>6.4.5. e-mail address, if any, of the holder,</p> <p>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 I&amp;APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations.</p>	X			Notification of the EA was forwarded to all registered I&Aps.
7		The listed activity, including site preparation, must not be commenced with within 20 (twenty) calendar days from the date the	X			The project commenced

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		holder notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided, <i>i.e.</i> , the listed activity, including site preparation, must not commence until the appeal is decided.				more than 20 days later.
8		<p><b>Management of Activity</b></p> <p>The draft or Environmental Management Programme (“EMPr”) submitted as part of the application for Environmental Authorisation is hereby approved insofar as it relates to the construction phase of the development and must be implemented.</p>	X			The conditions of the EA and EMPr were implemented on site.
9		The Maintenance Management Plan (“MMP”) which forms part of the EMPr must be amended to include the necessary method statements for the proposed maintenance works. The amended MMP must be submitted to this Department for approval within 3 (three) months of the date of this decision.	X			The MMP was submitted to the Department and approved.
10		The EMPr, including the MMP must be included in all contract documentation for all phases of implementation.	X			Both the EMPr and MMP are included in the contract documentation.
11		<p><b>Monitoring</b></p> <p>The holder must appoint a suitably experienced environmental control officer (“ECO”), or site agent where appropriate, before commencement of the proposed development to ensure compliance with the provisions of the</p>	X			A suitably qualified ECO was appointed prior to commencement of the construction activities and monthly audits are conducted. Reports are

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		EMPr and the conditions contained herein. The ECO must conduct site visits and submit ECO Reports on a monthly basis to the competent authority.				provided to the competent Authority as required.
12		A copy of the Environmental Authorisation, EMPr, MMP, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request, including a publicly accessible website.	X			All relevant documentation was kept on file at the construction office on site. Copies thereof is available from the Engineers.
13		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.	X			All relevant documentation was kept on file at the construction office on site and with the project manager.
14		<p><b>Auditing</b></p> <p>In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person, that is not the ECO referred to in Condition 11 above and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014.</p>	X			<p>The construction on site had commenced in Feb 2024. WNECS was appointed to assist in doing the external audits. The audit described in 14.1 was conducted on 7 May 2024 which was within the first 3 months after the commencement of construction.</p> <p>Ensure that the audit report is</p>

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		<p>The Audit Reports must be compiled and subsequently submitted to the Department in the following manner:</p> <p>14.1. The holder must undertake an environmental audit and submit an Environmental Audit Report to the Competent Authority within 3 (three) months of commencement of construction.</p> <p>14.2. A final Environmental Audit Report must be submitted within 3 (three) months of completion of the proposed development.</p> <p>The holder must, within 7 days of the submission of each of the above-mentioned reports to the Competent Authority, notify all potential and registered I&amp;APs of the submission and make the report available to anyone on request and on a publicly accessible website.</p>				made available to registered I&APs within 7 days of submission.
15		<p><b>Specific Conditions:</b></p> <p>Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.</p> <p>Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any</p>	X			No heritage remains were exposed during the construction phase to date.

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		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.				
16		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 directive from the relevant heritage resources authority.	X			No heritage remains have been uncovered.
17		All noise and sounds generated during the proposed development must comply with the relevant SANS codes and standards and the relevant noise regulations.	X			No complaints have been recorded to date.
18		The development areas must be clearly demarcated prior to the commencement of the proposed development. All areas outside the demarcated areas must be regarded as "no-go" areas.	X			The development area and construction site is clearly demarcated and where possible access is managed and restricted by fencing and appropriate signage.  Construction activities only occur within the demarcated area.

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
19		Construction activities may only take place during the period from February to June to avoid bird and whale breeding seasons.	X			Construction activities are kept strictly to this schedule. At the time of the audit the final works for the construction period between Feb and June were underway. The next section will be completed between February and June 2025
<b>F</b>	General Matters					
1		Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activity.	X			All other statutory requirements are adhered to at present.
2		Non-compliance with a condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.	X			The contractor and project team adhered to the conditions of the EA and EMPr during the construction phase of the project.
3		If the holder does not commence with the listed activities within the period referred to in Condition 2, this Environmental Authorisation shall lapse for those activities, and a new application for Environmental Authorisation must be submitted to the Competent Authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the Competent Authority prior to the expiry date of the Environmental Authorisation.	X			Construction have commenced within the authorised timeframes.

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
4		<p>The holder must submit an application for amendment of the Environmental Authorisation to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the EIA Regulations, 2014 must be submitted.</p> <p>Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the Competent Authority must only be notified of such changes.</p>				<p><b>Not Applicable</b></p> <p>No amendments have been applied for.</p>
5		<p>The manner and frequency for updating the EMPr is as follows:</p> <p>Amendments to the EMPr, must be done in accordance with Regulations 35 to 37 of the EIA Regulations 2014 or any relevant legislation that may be applicable at the time.</p>				<p><b>Not-Applicable</b></p> <p>No amendments have been applied for.</p>
6		<p>It is recommended that the EMPr, as it relates to the operational phase of the development, be implemented.</p>	X			<p>The conditions of the EMPs and MMP are implemented on site.</p>
<b>G</b>	Appeals					
7		<p>Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (as amended).</p> <p>1. An appellant must –</p> <p>1.1 Submit an appeal in accordance with</p>				<p><b>Not Applicable</b></p> <p>– No Appeals were lodged.</p>

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		<p>Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and</p> <p>1.2 Submit a copy of the appeal to any registered I&amp;APs, any Organ of State with interest in the matter and the decision-maker, <i>i.e.</i>, the Competent Authority that issued the decision.</p>				
8		<p>2. An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered I&amp;APs–</p> <p>2.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and</p> <p>2.2 Submit a copy of the appeal to the holder of the decision, any registered I&amp;AP, any Organ of State with interest in the matter and the decision-maker <i>i.e.</i> the Competent Authority that issued the decision.</p>				<b>Not Applicable</b> – No Appeals were lodged.
9		<p>3. The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered I&amp;AP and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.</p>				<b>Not Applicable</b> – No Appeals were lodged.
10		<p>The appeal form/s must be submitted by means of one of the following methods:</p> <p>By post: Attention: Mr. M. Venter Western Cape Ministry of Local Government, Environmental Affairs and Development Planning Private Bag X9186</p>				<b>Not Applicable</b> – No Appeals were lodged.

Item	OEMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		CAPE TOWN 8000 By facsimile: (021) 483 4174; or By hand: Attention: Mr M Venter (Tel: 021 483 3721) Room 809 8 <sup>th</sup> Floor Utilitas Building, 1 Dorp Street Cape Town 8001				
11		4. The prescribed appeal form, as well as assistance regarding the appeal processes is obtainable from the office of the appeal authority/ at: Tel. (021) 483 3721, E-mail <a href="mailto:DEADP.Appeals@westerncape.gov.za">DEADP.Appeals@westerncape.gov.za</a> or URL <a href="http://www.westerncape.gov.za/eadp">http://www.westerncape.gov.za/eadp</a> .				<b>Not Applicable</b> – No Appeals were lodged.
H	Disclaimer					
12		The Western Cape Government, the holder, committees or any other public authority or organisation appointed in terms of the conditions of this Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.				<b>Not Applicable</b> – Construction had not been stopped due to non-compliance. The construction phase of the project is completed and the facility now move to operational requirements.

**Part 2: EMP Compliance: Management Measures and Specifications**

Item	EMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
1		<b>ENVIRONMENTAL MANAGEMENT ADMINISTRATION</b>				
13		Required Contractor Environmental Method Statements in place/approved and on file?	X			At the time of the audit the Method Statements were in place and approved.
14		Environmental Awareness Training Sessions/Environmental Inductions conducted, attendance recorded and on file?	X			All training records were in the Environmental file.
15		Waste management records (waste registers, waste manifests and lawful disposal receipts) up to date and on file?	X			A waste register was in place
2		<b>SITE ESTABLISHMENT AND ACCESS</b>				
16		Contractor's Camp (including site office, materials receiving area, toilet facilities, eating areas, etc.) located at the permitted/approved positions (by employer, landowner, municipality, Cape Nature, etc)?	X			The construction site and camp were located on the prescribed areas and had the necessary controls. All work areas have been cleaned and waste material was removed daily.
17		Approved parking, delivery, access points and routes?	X			Only the designated parking area was used during the audit.
18		Sufficient (1:15 staff), clean, no spills, and secured toilets available for employees on-site?	X			Portable ablutions were available to the team.
19		No long-term stockpiling at the materials receiving area / cleared daily of unused materials?	X			The construction site is cleared after the allowed for construction window.
3		<b>WILDLIFE ON SITE</b>				
20		No evidence of disturbance or injury to animals as a result of the construction activities, including nesting birds? (Rescue and relocations by professionals where required)?	X			At the time of the audit no evidence of injured or disturbed animals were observed.

Item	EMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
4		<b>SITE DEMARCATION/NO-GO AREAS</b>				
21		Sensitive features, material delivery/stockpile areas, and "no-go" areas (areas above HWM and 5 m on the seaward side of the new path) are designated using suitable demarcation? Landward work area boundary for the day's work demarcated with temporary mesh fence lined with shade cloth, removed at end of each day?	X			All work areas were clearly demarcated. Access are closed off using a fence daily.
22		No staff access, stockpiling, or work outside the designated/approved working and access areas?	X			All work was located within the designated areas.
5		<b>WORK AT WETLANDS</b>				
23		Access - HWM demarcated with pegs at wetlands? Timber hoarding used to cross wetlands if boardwalk not yet constructed?	x			Wetlands and HWM was clearly demarcated.
24		Separately store topsoil removed from excavations made in wetland areas and replace as the final backfill layer?	X			At the time of the audit all stockpiles were located inside the contractor's site camp.
25		No storage of materials or equipment within 20m of the wetland edge?	X			No materials were stored close to the wetland.
26		Base of the timber boardwalk at least 600mm above ground level, 30mm spacing between planks?	X			The boardwalk was constructed in line with the approved designs.
6		<b>PLANT AND FUEL HANDLING</b>				
27		No bulk fuel storage on site (<50l). Jerry cans placed and refueling undertaken, away from combustible materials and more than 20m from wetland/streams?	X			No bulk fuel were stored on site and no refuelling was done at the time of the audit.
28		Required drip trays in place (e.g. under fuel jerry cans, during refueling, under leaking plant)?	X			Drip trays were present in the construction camp. No fuels were present in the work areas at the time of the audit.

Item	EMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
29		No leaking plant or spillage, or spillages adequately mopped up and treated?	X			Spills are appropriately recorded and treated.
<b>7</b>	<b>HOUSEKEEPING AND WASTE MANAGEMENT</b>					
30		The Contractor has an approved Waste Management Plan in place?	X			At the time of the audit, separate bins for different waste types were present and utilised at the contractor camp.
31		Sufficient bins/bags on site to store solid waste, protected from wildlife and wind distribution?	X			None
32		No litter/dumping visible anywhere on the site?	X			None
33		The Contractor has updated (minimum monthly) waste disposal and recovery/recycling register on file to verify lawful disposal, filed with disposal receipts from the entity accepting the waste (when available)?	X			At the time of the audit, waste slips were presented in the file
34		Clean building rubble and hazardous waste stored and disposed of separately to general refuse?	X			At the time of the audit no waste were disposed, all waste were removed beforehand. However, clearly marked containers were present on site.
35		No paint products, chemical additives, or solvents disposed of on-site?	X			None
<b>8</b>	<b>CONCRETE AND CEMENT WORKS</b>					
36		No evidence of spilled waste concrete or empty cement bags anywhere on or off site as a result of the contractor's activities, not removed daily?	X			At the time of the audit the team was working very neat and carried all materials into and out from the site daily.
37		No pollution of soils, wetlands/water courses, or other sensitive environments as a result of batching or handling cement products (e.g. bunded areas/sumps are in place)?	X			At the time of the audit cement was mixed in the camp and moved to the different areas with wheel barrows as needed.
<b>9</b>	<b>MATERIALS TRANSPORT, STORAGE &amp; TRAFFIC MANAGEMENT</b>					
38		No evidence of materials falling or having fallen from the contractor's vehicles or	X			None.

Item	EMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		those of suppliers? Covered trucks/cleaned running boards as required?				
39		Roads and the public cliff path shall be clear of mud, sand, or other debris resulting from the contractor's activities? (Debris removed and not left on the side of the road/path).	X			The roads were clear of debris.
		Construction vehicles not obstructing access of other road users through offloading or parking? Flagmen if required?	X			At the time of the audit there were no construction vehicles.
		Erodible materials stored in a sheltered position/secured and stable?	X			All materials were stored in the contractors camp.
<b>10</b>	<b>HAZARDOUS MATERIAL HANDLING AND STORAGE</b>					
		Hazardous substances stored in well-labeled containers, liquids in drip trays, and removed from the site at the end of every working day? No pollution incidents reported or observed on the site?	X			All hazardous materials were stored in a designated area with appropriate controls.
<b>11</b>	<b>NOISE AND NUISANCE CONTROL</b>					
		Permitted working hours adhered to?	X			None
		Complaints of excessive noise/nuisance to surrounding residents/land users logged, investigated, and mitigated as required?	X			No complaints have been lodged at the time of the audit.
<b>12</b>	<b>STORMWATER CONTROL</b>					
		No impediment of the sea or stormwater runoff such that it creates damming?	X			At the time of the audit no damming was observed.
		No evidence of foreign substances entering the surrounding environment via polluted stormwater runoff?	X			None
<b>13</b>	<b>DUST/WIND BLOWN SAND CONTROL</b>					
		No evidence of significant wind-blown sand/dust problems?	X			None

Item	EMP / EA Ref	Specification	Compliance			Comments
			Yes	No	Part	
		Mitigation in place to prevent dust from affecting neighbouring residences or members of the public?	X			At the time of the audit the contractors camp and areas where materials were stored had shade netting around to prevent dust.
<b>14</b>	<b>FIRE MANAGEMENT</b>					
		No open fires made on site? No cigarette butts disposed of on site outside of designed bins?	X			None
<b>15</b>	<b>WATER USE</b>					
		No visible water leaks/water wastage observed on site (i.e. faulty taps, hose pipes, etc.)?	X			At the time of the audit no leaks were observed.
<b>16</b>	<b>EMERGENCY MANAGEMENT</b>					
		Contractor emergency management plans in place and up to date?	X			All emergency plans were in place and part of the site file.
		Hydrocarbon/chemical spills correctly responded to?	X			At the time no spills were observed.
<b>17</b>	<b>HERITAGE</b>					
		Correct procedure/reporting followed in case of a heritage discovery?	X			No heritage materials were discovered on the site to date
<b>18</b>	<b>SITE CLEANUP AND REHABILITATION</b>					
		No evidence of remaining facilities, wastes, or excess materials on site outside of active construction periods?	X			At the time of the audit, the site was still operational and not yet in the rehabilitation phase.
		No unrepaired damages/degradation caused by the Contractor's activities on site?	X			At the time of the audit, the site was still operational and not yet in the rehabilitation phase.
<b>19</b>	<b>SIGNAGE</b>					
		No entry signage displayed where required?	X			At the time of the audit the site was sufficiently demarcated and had sufficient signage to prevent access.

## SUMMARY OF RECCOMENDATIONS

The team was working very well and within the boundaries and restrictions of the EMP, EA and MMP. The site was well maintained and all operations occurred within the designated areas. All

materials and equipment were removed on a daily basis and the site was neat and tidy. All no-go zones were maintained and the team implemented very good environmental management. The construction materials and facilities were appropriately cleared and removed from site daily. No waste or other materials remained on site. The site was clean and had no evidence of spills. The construction staff were inducted on how to manage potential spills and leaks should they occur.

## **CONCLUSION**

This external audit found that, the all of the aspects on project was well managed in an attempt to ensure both compliance with the requirements of the EMPr, MMP and EA. The contractor and their team further implemented suitable environmental management of the site.

Items that needed attention during the ECO audits had been appropriately addressed and closed out. No significant negative environmental impacts as a result of non-compliance with the EMP/EA or negligence on the part of contractor or site agents were detected during this audit.

## **DECLARATION**

The auditor declares that every effort was made to conduct this audit in a thorough, professional, objective and fair manner.

Signed by W Nel on 21 June 2024 on behalf of WNECS (Pty) Ltd.



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