



APPENDIX I – ENVIRONMENTAL MANAGEMENT PROGRAMME

Prepared by: PHS Consulting

August 2026

DEA&DP Directorate Environmental Law Enforcement Ref: 14/1/1/E1/4/6/4/0971/26

DEA&DP Directorate Environmental Governance Ref: TBD

Document Version: Pre-Application Draft



ENVIRONMENTAL MANAGEMENT PROGRAMME

ERF 3733, MANDALAY



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APPENDIX

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KEY TERMS AND ABBREVIATIONS

Auditing - A systematic and objective assessment of an organization's activities and services conducted and documented on a periodic basis to a predetermined standard.

Contractor –

- (i) the main or specialised contractors as engaged by the applicant from time to time for the execution of the works, including all sub-contractors appointed by the main contractor of his own volition for the execution of parts of the works;
- (ii) any other contractor from time to time engaged by the applicant directly in connection with any part of the Works which is not a nominated subcontractor or a subcontractor to the main contractor.

Council – the local authority, City of Cape Town Municipality, its successors in title or assigns.

Department of Environmental Affairs and Development Planning (DEA&DP)– the provincial authority for sustainable environmental management and integrated development planning.

Developer/ Owner/ Applicant – Mandalay SH Project (Pty) Ltd

Environmental Management Programme (EMPr) an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation, and decommissioning of a project are managed, and that positive benefit of the projects are enhanced.

Environmental Control Officer (ECO) – a suitably qualified environmental consultant to be appointed by the Owner to oversee the implementation of the EMPr until the completion of works on the site.

National Environmental Management Act (Act 107 of 1998, as amended) (NEMA)– national legislation that provides principles for decision-making on matters that affect the environment.

National Water Act (NWA) – national legislation that provides principles for decision making on matters that relate to watercourse/water use/water bodies.

Alien Invasive Plants (AIP)– Introduced, non-indigenous plant species that out-compete indigenous vegetation and disrupt natural ecosystem processes.

Site - Area where the proposed development will take place

Workdays – the days of the week excluding Sundays and public holidays.

SECTION 1: CONTEXTUAL INFORMATION

1.1. Project Background

This Environmental Management Programme (EMPr) has been prepared in support of the Section 24G application for the densification of the approved residential development on Erf 3733, Mandalay. The property is located within an established urban area of the City of Cape Town Metropolitan Municipality, approximately 5 km south-southeast of Cape Town International Airport and 580 m east of Mitchells Plain District Hospital. The site is surrounded by residential development, schools, healthcare facilities and associated municipal infrastructure, with Mandalay Railway Station and the railway line located immediately north of the property.

Environmental Authorisation was granted on 28 October 2011 for the development of the broader Erf 776, including residential development and associated infrastructure. Following subdivision of Erf 776, the development rights were apportioned between the resultant properties, with Erf 3733 currently subject to Environmental Authorisation Ref. No. 16/3/3/5/A4/41/3009/22 (A), authorising approximately 521 residential units and associated infrastructure. During implementation of the development, portions of Wetland 7 were piped beyond the extent authorised in terms of the Environmental Authorisation. Although the piping was undertaken in accordance with the City of Cape Town's stormwater requirements and was authorised under a 2015 Water Use Licence, the additional piping was not authorised in terms of NEMA. The additional piping facilitated a revised, higher-density development layout, which was subsequently approved by the City of Cape Town on 5 November 2024 and provides for approximately 770 residential units, together with a small retail component and crèche.

An external environmental audit subsequently confirmed the extent of the unauthorised piping, and following consultation with DEA&DP, it was determined that a Section 24G application was the appropriate mechanism to regularise the unauthorised activities and consider the proposed densified development. A wetland offset was established in 2015 in accordance with the Water Use Licence to compensate for the loss of aquatic ecological functioning associated with the impacts to wetland 7.

This EMPr sets out the management, mitigation and monitoring measures required to minimise and manage environmental impacts associated with the proposed development and the ongoing operation of the site. It is intended to guide the applicant, contractors and relevant responsible parties in implementing the required environmental management measures during the construction and operational phases of the development. This EMPr is not a standalone document and must be implemented alongside the existing Wetland Offset Plan (Belcher 2015) and associated Maintenance Management Plan (PHS Consulting, 2026).

This EMPr forms part of the environmental authorisation process and provides the framework for ensuring that the development is undertaken and managed in accordance with the applicable environmental requirements and conditions of the Environmental Authorisation, should it be granted.

1.2. Activity Description

The following activities have already taken place on site:

- Authorised vegetation clearance and earthworks associated with the implementation of the authorised development on the original Erf 776, Mandalay (lawful)
- Piping of Wetland 7, including the additional extent beyond that authorised under the existing Environmental Authorisation, which facilitated the revised development layout and constituted the commencement of the proposed densified development (unlawful).

The following activities are linked to the unlawful commencement of the development and form part of this Section 24G application:

- Development of the City of Cape Town-approved densified social housing development comprising an increase in residential density from approximately 521 apartment units to approximately 770 apartment units.
- Inclusion of a small retail space and a crèche on the ground floor of one apartment block.
- Construction of internal infrastructure, roads, stormwater infrastructure, engineering services, boundary walls, landscaping, recreational facilities (braai & play areas), a refuse allocation area, communal washing and drying facilities, and ancillary works required to complete the approved densified development.



Figure 1: Locality map of Erf 3373, Mandalay and Original Erf 776, Mandalay

1.3. Relevant legislation and policies

This EMPr aims to highlight historic design, capacity, management, and use issues and proposes a means to manage these within the framework of environmental best practice, the guiding principles of the National Environmental Management Amendment Act (Act 62 of 2008).

The following is a list of the legislation that may be pertinent to the project and its long-term operational management. All activities on site must ensure compliance with the provisions of the legislation as applicable:

- The Constitution of the Republic of South Africa (Act 108 of 1996)
- National Environmental Management Act (Act 107 of 1998) – NEMA
- Government Notices 327, 325 and 324 in terms of NEMA
- National Water Act 1998 (Act 36 of 1998) – NWA
- National Environmental Management: Biodiversity Act 2004 (Act 10 OF 2004)
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species regulations
- National Building Regulations and Building Standards Act No. 103 Of 1977
- Natural Heritage Resources Act 1999 (Act 25 of 1999)
- Occupational Health and Safety Act (No. 85 of 1993)
- Basic Conditions of Employment Act 75 of 1997

1.4. The EMPr Document

The purpose of this Environmental Management Programme (EMPr) is to ensure that the environmental impacts associated with the various phases of the proposed development are effectively managed, mitigated, and kept to a minimum. The EMPr provides clearly defined and easily understood actions that must be implemented during each phase of the development in order to achieve the required environmental outcomes.

The EMPr is a dynamic document that is flexible and responsive to new or changing circumstances. It is legally binding on the Applicant, all contractors, sub-contractors, employees, and visitors to the site. The EMPr must be incorporated into all tender documents, contractual agreements, and conditions of appointment between the Applicant and any contractors.

The Environmental Authorisation (EA) confers legal status on the EMPr and any approved amendments thereto. This EMPr includes all relevant documentation contained within, and referenced by, this report and must be read in conjunction with all legally obtained authorisations, including the EA. Approval of the EMPr by the Department of Environmental Affairs and Development Planning (DEA&DP) requires that the applicant and all appointed

contractors comply fully with its provisions. Any amendments, changes, or upgrades to the EMPr must be submitted to and approved by DEA&DP before implementation.

Copies of the EMPr must be kept on site and made available to all senior personnel, who are required to familiarise themselves with its contents and ensure that the prescribed procedures are implemented accordingly.

The EMPr forms part of the contractual framework for this project and identifies the procedures to be followed by all contractors and employees to eliminate or reduce adverse environmental impacts associated with the works. Should any contractor or employee persistently fail to comply with the provisions of the EMPr, the Environmental Control Officer (ECO) may recommend that the individual be removed from the site. Should the owner or any employee continue to disregard the EMPr requirements, the ECO must notify the relevant authority to initiate a compliance audit.

The EMPr further sets out environmental goals and objectives required to achieve acceptable environmental standards. Issues identified in the Section 24G report must be addressed during the construction and operational phases to ensure that environmental impacts are appropriately mitigated.

The Applicant is ultimately responsible for the overall implementation of the EMPr.

NOTE: This EMPr incorporates the findings of the Freshwater Impact Assessment (August 2025) undertaken for the site. The identified risks have been incorporated into the EMPr, and additional general risks have been included. The EMPr must be implemented in conjunction with conditions contained in the Environmental Authorization. The applicant and ECO must use the above-mentioned documents throughout the operation of the development. This should also become a condition in the Environmental Authorization.

SECTION 2: PROJECT PHASES

2.1. Construction Phase

The construction phase relates to the physical construction activities associated with the proposed social housing development and includes all vegetation clearance, bulk earthworks, building works, and the installation of services (including water, sewerage, and electricity). The remaining construction works to be undertaken onsite comprise the City of Cape Town-approved densified social housing development, including 770 apartment units, a small retail space and a crèche on the ground floor of one apartment block, together with all associated internal infrastructure, roads, stormwater infrastructure, engineering services, boundary walls, landscaping, recreational facilities (including braai and play areas), refuse allocation areas, communal washing and drying facilities, and other ancillary works required to complete the approved development.

The applicant must ensure that the construction phase is conducted in accordance with the 'duty of care' principle as set out in the National Environmental Management Act (Act No. 107 of 1998). No expansion of the approved development footprint may occur without prior environmental authorisation.

2.2. Operational Phase

The operational phase refers to the ongoing activities associated with the occupation and use of the completed social housing development.

The following activities form part of the operational phase of the development:

- Occupation and use of the residential units, retail space and crèche.
- General maintenance of buildings, internal roads, recreational areas, landscaping and associated infrastructure.
- Operation and maintenance of municipal service infrastructure, including water, sewerage, electricity and stormwater systems.
- Management, storage and lawful disposal of domestic and other waste generated onsite.
- Maintenance and management of the Wetland 7 offset area in accordance with the applicable management requirements.
- Maintenance of landscaped and communal open spaces, including the control of alien invasive vegetation.

- Maintenance of communal facilities, including refuse, washing and drying areas and recreational facilities.

The applicant must ensure that the operational phase is conducted in accordance with the duty of care principle as set out in the National Environmental Management Act, 1998 (Act No. 107 of 1998). No expansion or alteration of the approved development footprint may occur without the necessary environmental authorisation.

2.3. Mitigation and Rehabilitation Phase

A Maintenance and Management Plan (MMP) (Wetland Maintenance Management Plan, Erf 776, Mandalay, June 2026, PHS Consulting) has been developed for the long-term management, maintenance and monitoring of the wetland areas within its scope, including:

- Wetland 3;
- The remaining undeveloped portions of the associated 30 m buffer around Wetland 3; and
- The designated wetland offset areas established to compensate for impacts to Wetland 7.

The MMP must be implemented in full throughout the operational phase of the development.

SECTION 3: RESPONSIBILITIES AND ENFORCEMENT OF THE EMPR

3.1. The Competent Authority

DEA&DP will review the EMPr and on approval they may have the following role to play:

- Review and monitor implementation of the EMPr;
- Review whether there is compliance by the applicant;
- Perform random control checks;
- Review ECO, incident and audit reports;
- Enforce legal mechanisms for contraventions of the EMPr.

3.2. The Applicant

The holder of the EA (i.e. the applicant) is accountable for the potential impacts of the activities that are undertaken and is responsible for managing these impacts. The Applicant has the overall environmental responsibility to ensure that the implementation of the operational requirements complies with the relevant legislation and the conditions of the approved EMPr. The Applicant is also responsible for ensuring that all other environmental related legislation is complied with. The Applicant is responsible for the development and implementation of the conditions of the EA in terms of the life cycle of the development.

Amongst the general responsibilities above the Applicant is also responsible for:

- Appointing a Site Manager, ECO and where required an Environmental Auditor.
- Take the necessary action in terms of non-compliances.
- Ensuring that all the applicant's, staff, representatives, contractors, consultants and any other agent operating under the employ of the applicant comply with the EA and that suitable environmental awareness training is undertaken.
- Considering the ECO's observations and recommendations and acting where required.

3.3. The Contractor

The contractor will be required, where specified, to provide Method Statements setting out in detail how the management actions contained in an EMPr will be implemented in order to ensure that the environmental management objectives are achieved. The responsibilities will include:

- Demarcate the no-go areas within the vicinity of the proposed activities through the appropriate methods as discussed and agreed upon with the ECO.
- To oversee the implementation of environmental procedures set out in this document.
- The Contractor must ensure that all management staff involved with the project are aware and familiar with the requirements of this EMPr.
- Provide inputs to the regular (e.g. monthly) environment report to be prepared by the ECO.
- Liaise with the 'construction team' on issues related to implementation of, and compliance with, the EMPr.

3.4. The Site Manager

A Site Manager must be identified to assume overall responsibility for managing the property, employees, and contractors and for ensuring that the environmental management requirements are met. All decisions regarding environmental procedures and protocol must be approved by the site manager, who also has the authority to stop any activity in contravention of the EMPr.

The site manager will have the following environmental control responsibilities:

- Present environmental awareness training to all contractors/staff in conjunction with the ECO.
- Regularly monitor the site and operation of the facility for potential environmental issues. It is recommended that weekly site inspections are undertaken during the construction phase of the development.
- Consult with the ECO, EA holder, and all staff/contractors to resolve emerging environmental issues,
- Issue any instructions from the ECO to the management team via an appropriate management tool, and

- Keep a Site Control Register consisting of the following sections (please refer to Appendix A for a template):
 - The **Site Control Sheet and Site Instruction Section** will be used to record observations and comments from weekly site monitoring relating to potential environmental aspects and any issues encountered during site works. This section will also be used to document general site instructions aimed at protecting environmentally sensitive areas or any site features that may be potentially impacted by the works.
 - The **Incidents Reporting Section** will be used to record all incidents pertaining to environmental issues onsite as well as remedial actions steps that were or need to be taken [refer to Appendix A for a incident report template]
 - The **Complaints Register** will be used to record all complaints received and responses thereto.

Please note the above list is not exhaustive, the responsibilities of the site manager are adaptive.

3.5. The Environmental Control Officer (ECO)

A suitably qualified individual must be designated and appointed by the EA Holder to fulfill the role of Environmental Control Officer, to ensure and oversee the implementation of the EMPr onsite during construction. The role of the ECO is essentially seen as an interactive one which involves site visits approximately once a month during construction. Site visits may need to be less frequently during certain stages of the development, depending on the sensitivity of the area in which construction is taking place.

The responsibilities of the ECO during the life span of the project will include:

- Monitor compliance with the EMPr
- To environmentally educate and raise the awareness of the Contractors and their staff as to the sensitivity of the site.
- Review method statements and advise on environmentally responsible practices
- Maintain open and direct communication with the landowner, EA holder, site manager, contractors, and authorities
- Monitor site activities and report on environmental performance and non-compliance
- To take immediate action on site where clearly defined no-go areas are violated, or in danger of being violated, and to inform the RE and Site Manager immediately of the documents and the action taken.
- To keep an up-to-date record of works on site, as they relate environmental issues.
- To be contactable by the public regarding matters of environmental concern as they relate to the development.

3.6 The Environmental Auditor

Where required by the EA an environmental auditor will be appointed by the applicant. The auditor will be an independent environmental consultant. The auditor will carry out a compliance audit based on the EA and EMPr of all of the activities being undertaken. The auditor will conduct, and report audit findings based on the audit requirements stipulated in the EA. Any audit costs are for the applicant account.

SECTION 4: ENVIRONMENTAL IMPACTS

4.1. Potential Environmental Impacts & Mitigation Measures

The following possible impacts and associated mitigation measures have been identified within the existing and proposed scope of work for the project phases:

Identified Impact		Proposed mitigation
Planning, Design and Construction Phase		
1	Alteration of physical site geography and drainage: The additional piping of Wetland 7 and increased development intensity will result in greater built form, earthworks and soil disturbance within the existing development footprint.	• Restrict all construction activities, earthworks and material storage to the approved development footprint. • Implement the CoCT approved stormwater management plan to manage increased runoff and prevent erosion. • Maintain and manage the piped Wetland 7 stormwater system to ensure continued functionality. • Maintain the existing hydrological connection between the northern catchment and the wetland offset area (stormwater pond) through the piped stormwater channel (Wetland 7), and ensure that stormwater runoff from the proposed development is routed to the existing wetland offset area. • Maintain and manage the stormwater pond on Erf 3547 which has been designed as the wetland offset for the full piping of Wetland 7. • Implement erosion and sediment-control measures during construction. • Stockpiles of erodible material associated with the construction works must be located at least 32m from the delineated edge of a watercourse and protected with suitable erosion control measures (e.g. erosion blankets or geotextile) to prevent sediment loss. • Avoid unnecessary disturbance of areas outside the development footprint. • Implement the EMPr and relevant provisions of the MMP. • All undeveloped areas within the development footprint shall be suitably landscaped in accordance with the approved landscaping plan (Appendix P) to minimise hard surfaces, improve biodiversity and promote stormwater infiltration
2	Alteration and loss of aquatic habitat and ecological functioning associated with the piping of portions of Wetland 7 beyond the authorised extent.	• Implement and maintain the approved wetland offset (Blue Sceince, 2015) in accordance with the applicable Water Use Licence requirements. • Implement the Maintenance Management Plan (MMP) (PHS Consulting, 2026) to ensure the ongoing management and maintenance of the wetland offset area. • Maintain the existing hydrological connection between the northern catchment and the wetland offset area (stormwater pond) through the piped Wetland 7, and ensure that stormwater runoff from the proposed development is routed to the existing wetland offset area.

Identified Impact		Proposed mitigation
3	Potential indirect impact on Wetland 3 (west of the proposed development site) from increased development intensity.	• Maintain the 15 m construction and operational buffer around Wetland 3 as identified by the Freshwater Impact Assessment (FEN, August 2026) • Ensure that stormwater runoff from the development is managed and directed to the existing stormwater pond forming part of the wetland 7 offset area, rather than directly towards Wetland 3. • Prevent the storage of construction materials, waste or equipment within the 15 m buffer. • Position the development boundary wall to accommodate and maintain the full 15 m buffer around Wetland 3 as per the Freshwater Impact Assessment (FEN, August 2026).
4	Temporary disturbance of the wetland offset area on Erf 3547 during rehabilitation.	• Implement and maintain the approved wetland offset in accordance with the applicable Water Use Licence requirements. • Implement the Maintenance Management Plan (MMP) to ensure the ongoing management and maintenance of the wetland offset area. • Incorporate the establishment of obligate and facultative hydrophytes within the wetland offset • Remove excess sediment, debris and litter from the offset area on a continual basis in accordance with the MMP. Please note: While the long-term impacts of this phase are considered to be a nett positive, the active works thereof may result in disturbances to soil resulting in compaction and erosion, and water quality impacts due to movement of machinery and personnel within the area, but only during the active rehabilitation phase.
5	Temporary employment opportunities (direct and indirect) generated during construction	• This is a positive impact. No mitigation required.
6	Stimulation of the local economy and supply chain through the procurement of goods and services during construction.	• This is a positive impact. No mitigation required.
7	Potential noise nuisance of construction works to surrounding neighbours	• Plan construction activities to minimize noisy work during sensitive hours (e.g., early mornings, evenings, weekends, or holidays). • Restrict working hours to day-time hours during weekdays and half day Saturday. No work on Sundays and public holidays. • Awareness of site of workers to keep noise levels down during working hours. • All vehicles and machinery/equipment used onsite must be regularly maintained and kept in good working order to prevent excessive noise. • Avoid unnecessary idling of vehicles and machinery. • Maintain an open line of communication with the local community to inform them about the construction schedule • Maintain a complaints register and investigate and address noise complaints promptly. • Establish a dedicated contact person to address noise related issues. • The Western Cape Noise Control Regulations (P.N. 200/2013) must be adhered to. Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.

Identified Impact		Proposed mitigation
8	Dust generation during the construction phase	• Clear land areas in phases as required for construction purposes to minimize unnecessary exposure of bare ground. • Schedule construction activities to minimize the amount of disturbed soil at any given time. • Cleared areas must be suitably stabilised (e.g. through the use of mulch or straw) to prevent dust generation. • Shield dust blowing onto adjacent roads and adjacent land users. • Dissipate dust with water if needed, however care must be taken that this does not result in excess runoff. • A suitable speed limit (20-40km/h) must be enforced on all internal access roads. • Control the flow of vehicles to minimize dust generated during entry and exit from the site. • Train construction workers (as part of general environmental awareness training) on dust control practices and the importance of reducing dust emissions. • Provide personal protective equipment (PPE), such as dust masks, for workers who may be exposed to dust. • Establish suitable indigenous landscaping between developed blocks. • Ensure all intervening areas between buildings and roads are appropriately vegetated • The National Environmental Management: Air Quality Act, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013 must be adhered to Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
9	Visual impacts during construction activities	• Clear land areas in phases as required for construction purposes to prevent unnecessary exposure of large portions of bare ground. Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
10	Intensified use of access roads to facilitate construction potentially resulting in congestion.	• Minimize the number of vehicles accessing the site to what is strictly necessary for construction purposes. • Ensure construction vehicles use designated access routes and do not obstruct public roads. • Provide a single vehicular access from Stinkwood Road, with access control gates set back 12 m into the site to accommodate vehicle stacking. • Clearly define entry and exit points for construction vehicles and personnel. This reduces confusion and congestion. • Provide adequate on-site space for loading, unloading and turning to prevent vehicles queuing on public roads • Use appropriate, highly visible temporary signage and traffic controls, including speed limits, detour and construction-zone warning signs, to safely manage construction vehicle movements. • Maintain access for surrounding residents, pedestrians and public transport throughout construction. • Designate safe pedestrian pathways, preferably separate from vehicle traffic. Use barriers to protect pedestrians. • Clearly mark designated parking areas for construction vehicles to prevent them from obstructing roadways. • Plan construction activities to minimize the impact on traffic during peak hours. Whenever possible, schedule work during off-peak times.

Identified Impact		Proposed mitigation
		Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
11	Waste generation from construction activities – general construction waste.	• Minimise new materials brought on site. • No burning of waste on site – • Maximise recycling of waste from construction activities. • Provide portable toilets where work is being undertaken (1 toilet per 10 workers). These toilets must be located on level ground and more than 32m from the edge of any delineated watercourses. Portable toilets must be regularly serviced and maintained. – • Provide an adequate number of bins on site and encourage construction personnel to dispose of their waste responsibly. – • Waste should be stored in closed containers to prevent dispersal by wind. • Waste generated by construction personnel must be removed from the development area and disposed of at a registered waste disposal facility on a weekly basis. • No material (incl. excavated material, building materials or removed vegetation) may be stockpiled, temporarily stored, or dumped within 32m of the delineated watercourses • Spoil material must be appropriately disposed of at a registered waste disposal facility. • The Contractor must ensure that no building rubble or waste is left behind onsite. • All construction waste must be disposed of at an appropriate registered facility. Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
Planning, Design and Construction Phase		
12	Increased development intensity and associated hard surfaces may increase stormwater runoff within the existing development footprint.	• Implement CoCT the approved stormwater management plan to manage increased runoff and prevent erosion. • Maintain and manage the piped Wetland 7 stormwater system to ensure continued functionality. • Maintain the existing hydrological connection between the northern catchment and the wetland offset area (stormwater pond) through the piped Wetland 7, and ensure that stormwater runoff from the proposed development is routed to the existing wetland offset area. • Maintain and manage the stormwater pond on Erf 3547 which has been designed as the wetland offset for the full piping of Wetland 7. • Keep stormwater infrastructure clear of litter, debris and blockages through regular maintenance • Implement the EMPr and relevant provisions of the MMP. • All undeveloped areas within the development footprint shall be suitably landscaped with indigenous species to minimise hard surfaces, improve biodiversity and promote stormwater infiltration
13	Long-term management and maintenance of the designated Wetland 7 offset area	• This is a positive impact. No mitigation required.
14	Increased number of social housing units developed and available for occupancy	• This is a positive impact. No mitigation required.

Identified Impact		Proposed mitigation
15	Permanent job creation during operation of the retail component and creche	This is a positive impact. No mitigation required.
16	Increased general residential noise associated with increased development density	Ensure compliance with applicable City of Cape Town noise control requirements. Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
17	Potential visual impact as a result of a higher-density development	- Ensure building heights remain below 15 m, in accordance with the GR2 zoning. - Implement the CoCT approved building plan which takes existing resident's concerns into account. - Maintain landscaping and communal open spaces throughout the operational phase. Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
18	Potential traffic related impacts during operation of the development	- A dedicated left-turn lane should be provided on Hillcrest Road at the Swartklip Road/Hillcrest Road intersection. - A one-way stop should be introduced on Hillcrest Road at the Montclair Drive/Hillcrest Road intersection. - A single vehicle access point should be provided from Stinkwood Road, with the access gates set 12 m back from the road. - Pedestrian access should be provided on both sides of the site access road. - Internal sidewalks should be at least 1.5 m wide. - Parking should be provided at a ratio of 0.53 bays per residential unit, with additional parking for the crèche and retail uses.
19	Increased demand for service provision and resource usage	- Water-efficient sanitary fittings, including dual-flush toilets and low-flow taps and shower fittings, must be installed. - Energy-efficient LED lighting and appliances must be used where applicable. - Building orientation and insulation must be optimised to improve energy efficiency. - Water-wise landscaping must be implemented where applicable. - The solar PV system for water heating must be installed and maintained to reduce electricity demand. - Recycling must be implemented where practicable.
20	Increased generation of domestic waste during the operational phase	- Domestic waste must be collected regularly by the City of Cape Town in accordance with the municipal waste collection schedule. - Adequate waste bins must be provided for all residential and ancillary uses. - Waste storage areas must be kept clean, secure and free of litter. - Recycling and waste separation must be encouraged where practicable. - Waste must not be disposed of in or near a wetland, stormwater system or open areas.
Decommissioning		
21	Excavation and removal of existing stormwater infrastructure, resulting in soil disturbance, dust and noise	Limit demolition and rehabilitation activities to the minimum required area and implement appropriate dust, noise, erosion, sediment and waste management measures
22	Altering the established Wetland 7 stormwater system	Retain the established Wetland 7 stormwater system and avoid alterations that could compromise drainage capacity, increase flood risk on water pollution

Identified Impact		Proposed mitigation
	could disrupt drainage, increase flood risk and result in potential water quality impacts.	
23	Reduced provision of social housing units and employment opportunities	Implement the proposed higher density development layout inclusive of the retail and creche component

SECTION 5: IMPACT MANAGEMENT OUTCOMES AND ACTIONS

This section describes the proposed impact management actions and outlines how the desired impact management outcomes will be achieved. Where applicable, it also identifies measures to avoid, modify, remedy, control, or cease any action, activity, or process that may cause pollution or environmental degradation, and to ensure compliance with prescribed environmental management standards and practices.

5.1. Pre Construction Phase Management Plan

5.1.1. Environmental Awareness Training

All contractor teams involved in work on the development must be briefed on their obligations towards environmental controls and methodologies. The briefing should take the form of an on-site talk and demonstration by the ECO and/or Site Manager. The education program should be aimed at all levels of management within the Contractor team.

The environmental awareness education program should commence with entry onto the site, prior to any construction activities taking place by each team. All personnel must be made aware of the details of the EMPr which will be applicable to them. It must be ensured that staff members who are not proficient in the language of instruction are provided with training in a suitable alternative language.

As a minimum the training must include:

- Explanation of the reason of complying with the EMPr;
- Discussion of the potential environmental impacts of construction and operation activities;
- Employees' roles and responsibilities on site, including emergency preparedness;
- Explanation of the mitigation measures that must be implemented when carrying out the activities;
- Explanation of the specifics of this EMPr and its specifications (no-go areas, smoking areas etc.);
- Information on human/wildlife conflict mitigation.

5.1.2. Communication Procedures

There is to be continual communication between the contractor, landowner, EA holder, site manager, and the ECO. The ECO will advise the site manager on factors relating to the EMPr and all environmental matters on site.

On-site communication and record keeping

- A Site Control Register as outlined in Section 3.4 must be kept on site for recording environmental instructions issues by the site manager, environmental observations, and any issues that arise during activities and corrective actions taken (Please refer to Appendix A).
- The register should be kept for at least two years after completion of activities and made available to the relevant authority upon request.
- A photographic record of the site before and after activities must be kept for reference.
- The file must remain accessible on site at all times and be available for inspection during monitoring visits by the local authority, ECO or Auditor.

Method Statements

For any activity, the Contractor must submit a Method Statement to the ECO for review and approval before construction may begin. The Method Statement must outline a step-by-step plan describing what work will be done, how it will be carried out, where it will take place, and when it will occur. Its purpose is to ensure that activities are conducted in a logical, controlled manner that minimises environmental impacts within reasonable time and cost limits.

Programming of Construction Activities

The ECO must be supplied with a detailed program of all construction events to allow for proper monitoring on site. Any amendments to the program of construction events for any reason must be forwarded to the ECO.

Suspension of works

The ECO & site manager is empowered to order the contractor to immediately cease any activities or operations that are required to be stopped as a matter of urgency to prevent serious adverse environmental impacts or potential impacts on the site or any of the adjacent properties or areas outside the boundaries of the site. The ECO / site manager shall without delay report any such actions to the EA holder. The suspension will be enforced until corrective action has been taken, with no extension of time for such delays. In such a case, all costs are to be borne by the contractor.

Public Complaints

All public complaints received are to be registered by the site manager and addressed immediately. Public complaints and responses are to be recorded in the Site Control Register and included in the monthly environmental report by the ECO.

Safety

The Contractor is to appoint a safety steward, who will be responsible for safety of the labour force, construction activities and handling emergency situations on site during construction hours.

5.1.3. Site Definition and Demarcation

Prior to the commencement of construction activities, the applicant must appoint a suitably qualified and experienced ECO. The approved development footprint must be clearly defined and demarcated, and construction activities must be restricted to the approved development footprint. Areas outside the approved development footprint must be treated as no-go areas unless otherwise authorised.

The ECO must identify suitable areas within the development footprint for the storage of construction materials and parking of construction vehicles and machinery. These areas must be managed to prevent unnecessary disturbance and environmental impacts.

The ECO must ensure that appropriate erosion and sediment control measures are implemented where required, particularly in areas where soils are exposed or disturbed. Exposed soils must be stabilised as soon as practicable to minimise erosion, sedimentation and site runoff.

Contractor's Camp

A single Contractor's Camp must be established for use by all contractors and subcontractors, providing staff facilities and storage for all materials and equipment. Construction vehicles and machinery must be accommodated onsite when not in active use.

Toilet Facilities

Sanitary facilities must be provided at a ratio of one toilet per ten workers, located on level ground more than 30m from the delineated extent of wetland 3 and the wetland 7 offset area. Chemical toilets must be regularly serviced, maintained in a hygienic condition, and secured to prevent tipping. Spillage must be avoided, and all waste safely stored and removed off-site. A contingency plan for spills must be submitted to and approved by the ECO. Toilets should be sited to minimise environmental impact and must not be placed in areas of standing or running water during winter.

5.2. Construction Phase Management Plan

5.2.1. Material Handling and Storage

Stockpiles of construction material must be managed in terms of best practice codes. Stockpiles of erodible material must be covered by an erosion blanket (geotextile weighted with bricks) and may not be located within 30m from the delineated edge of any watercourses.

All building materials are to be prepared within a dedicated batching / contractor's area or within the Contractor's Camp. Should onsite concrete mixing be required it must be mixed on an impermeable surface in an area of low environmental sensitivity, outside of the no-go areas. Surplus or waste concrete must be sent back to the supplier who will dispose of it. Temporary bunds must be constructed around areas where cement is to be cast in situ.

Fuels and hazardous materials

Fuels and flammable materials are to be stored in suitably equipped storage areas, inside the Contractor's Camp. These areas shall comply with general fire safety requirements. Impervious materials are to be used in these storage areas to prevent contamination of the ground in the event of spillages or leaks.

The quantities/volumes of hydrocarbons stored on-site must be kept to a minimum and must be stored in an appropriate manner. Bulk fuel depots are to be placed within hardened bunded areas. Bunds are to have a holding capacity equal to 110% of the largest fuel container. The Contractor is to ensure that he is aware of the effects of all substances on staff and the environment, and the correct action to take in the case of any incident involving these materials, according to the MSDS. The responsible management of hazardous chemicals should be practiced, and no storage or handling of chemicals must take place within or within close proximity to delineated watercourses.

5.2.2. Waste and Effluent Management

Waste management during the construction phase is the responsibility of the contractor. Refuse refers to all construction debris (cement bags, rubble, timber, cans, nails, wire, spilt bitumen, glass, packaging, plastic, organic matter, etc.). Refuse generated during the execution phase of the works should be stored in secured on site bins, protected against wind dispersion, and removed on a regular basis for disposal at a permitted disposal site. The Contractor must supply adequate refuse bins on site to manage waste generated. No burning or burying of refuse on site should be allowed. Refuse bins must be watertight and windproof. No dumping of building rubble allowed. All waste materials are to be removed from the site once construction is completed.

Should onsite concrete mixing be required it must take place on an impermeable, bunded surface in an area designated by the ECO as suitable. All cement effluent from mixer washings and run-off from batching areas and other work areas shall be contained in suitable sedimentation ponds. Sedimentation ponds, which must be suitably lined to prevent contamination of the ground, shall be allowed to dry on a regular basis to allow for solid material to be removed. The material must be disposed of in a suitable manner, depending on the nature of the material, and according to the discretion of the ECO. Concrete and cement-related mortars must be disposed of in an environmentally sensitive manner as these can be toxic to aquatic life.

Stormwater management must ensure that no effluent, including harmful substances such as paint or solvents, may leave the disturbance footprint. Contaminated water must be collected in suitable containers and removed from site for suitable disposal.

5.2.3. Stormwater Management

The Contractor should take appropriate measures to control run-off from the site. A construction and operational stormwater management plan must be developed and implemented detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems. Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation and the re-vegetation of any disturbed areas.

The Contractor must take suitable measures to prevent erosion resulting from a diversion, restriction or increase in flow of stormwater caused by the presence of his own works, operations, and activities to the satisfaction of the ECO. Measures must be put in place to prevent silt from entering any downstream areas.

The Contractor may need to construct a berm or similar control measures to prevent stormwater from running from excavated areas, stockpiles of waste and excavated material into adjacent areas. Any runoff collected in such bunded areas, which contain oils, fuels, chemicals, or other potentially harmful substances, must be pumped out, collected in suitable containers, and removed from site for suitable disposal.

5.2.4. Construction Machinery

All construction machinery used must be suitable for the scale of the project at hand. All construction vehicles and machinery must be maintained in a good, working condition and must be regularly inspected for possible oil / fuel leaks. Should any leaks be detected they must be repaired as soon as possible. All maintenance and refuelling of vehicles and machinery should take place offsite as far as possible alternatively within bunded areas as designated by the ECO. Drip trays should be placed under vehicles overnight. The ECO may order the removal of equipment

that is causing continual environmental damage by leaking oil or diesel for example, until such equipment has been repaired.

5.2.5. Noise Impacts

The contractor must take appropriate measures to limit the impact of unreasonable noise from construction activities. Construction activities to be limited to working hours weekdays (07:00 – 18:00) and half day Saturdays (08:00 – 13:00). No work may be undertaken on Sundays and on public holidays. All construction vehicles and machinery should be maintained in good working condition and additional noise screening mechanisms also included in the design.

5.2.6. Cleanliness of Roads

The contractor must ensure that construction vehicles do not spill or drop any construction materials (sand, cement, debris, etc) onto public or private roads. If this should occur, it is the responsibility of the contractor to ensure that the roads are suitably cleaned.

5.2.7. Erosion Control

Care must be taken to prevent erosion of soils on the construction site. Should any erosion be detected on site, the ECO or site manager must identify the cause of such erosion and ensure that the most appropriate method of mitigation or stabilisation is employed as soon as possible. Runoff generated during construction should not cause any damage and should be controlled or contained during periods of high rainfall.

5.2.8. Dust Control

The contractor shall take appropriate measures, to the satisfaction of the ECO to minimise the generation of dust and mud on the site. Where relevant this may include supplying suitable stabilisation (such as mulch or straw stabilisation) for all cleared ground or watering ground during exceptionally windy conditions. A suitable speed limit (20-40km/h) must be enforced on all gravel/ dirt roads.

5.2.9. Trenching and Service Installation

The excavation of trenches for service installation should be undertaken in a phased manner where possible, to allow for trenches to stand open for a maximum of three days only. Materials removed from trenches must be stockpiled in a suitable position and should be stabilised if backfilling is not expected to occur within the following two days. Service installation should be coordinated to prevent the undue reopening of trenches for the installation

of additional services. Since most of the service infrastructure is already in place on the property, service installation and trenching is expected to be minimal.

5.2.10 Archaeology and Cultural Heritage

If any heritage remains are exposed during excavations or any other action on the site these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from the competent authority.

5.2.11. Sensitive Environmental Features

Construction activities must be confined to the approved development footprint, and all areas outside the approved footprint, including Wetland 3, the remaining undeveloped portions of its 30 m buffer, and designated wetland offset areas, must be treated as no-go areas. These areas must be clearly identified and demarcated where required, and no construction activities, material storage, stockpiling or parking may occur within them. The relevant sensitive environmental features must be managed in accordance with the MMP.

All wild fauna encountered onsite, including birds, reptiles and amphibians, must not be harmed, captured or deliberately disturbed. The ECO must be notified if fauna requires removal or relocation, and no hunting, trapping or poaching may be undertaken by construction personnel.

5.2.12. Fire

Although the site is located within an established urban area, appropriate measures must be implemented during construction to prevent accidental fires and protect surrounding properties and infrastructure.

- Open fires are prohibited onsite.
- Smoking is prohibited in areas where flammable materials, fuels or other fire hazards are present.
- Cigarette butts must be fully extinguished and disposed of in suitable fire-safe containers.
- Appropriate fire extinguishers must be readily available during welding, cutting and other hot-work activities.
- Flammable materials and fuels must be stored safely and away from ignition sources.
- The Contractor must ensure that all construction personnel are informed of and comply with the fire prevention requirements.

- Any fire occurring as a result of negligence or non-compliance with these requirements must be reported immediately and managed in accordance with the applicable emergency procedures.

5.2.13. First Aid

The contractor must provide and maintain a suitable first aid kit on site, with a member of staff suitable qualified in first aid on site during working hours, in accordance with the Occupational Health and Safety Act.

5.2.14. Post-Construction Clean-Up

The applicant and contractor must ensure that all areas are fully cleaned up and rehabilitated upon completion of construction activities. This includes, but is not limited to, the following actions:

- Removal of excess building materials from the property,
- Removal and lawful disposal of all stockpiled materials, including excess building material and excavated soil,
- Removal of all materials used to demarcate the disturbance footprint,
- Removal of all temporary toilet facilities,
- Removal of all temporary signage,
- Removal of all waste from construction camps,
- Removal and correct disposal of all alien vegetation removed,
- Removal of vehicles from site,
- Rehabilitation of any terrestrial and aquatic areas (reshaping and vegetation) affected by construction activities.

5.2. Operational Phase Management Plan

The Operational Phase of this EMPr covers the ongoing management and maintenance activities required to ensure that the social housing development is operated in an environmentally responsible and sustainable manner. The following section outlines the key objectives and associated management measures to minimise potential environmental impacts throughout the operational lifespan of the development.

The following key goals have been established:

1. Implement and maintain suitable landscaping onsite
2. Promote efficient use of resources and minimise waste and pollution.

3. Maintain stormwater and other onsite service infrastructure to prevent environmental impacts.
4. Ensure ongoing implementation of the applicable Maintenance and Management Plan as it relates to the wetland 7 offset area

5.2.1. Implement and maintain suitable landscaping onsite

Management Objective:	To provide functional, attractive and well-maintained landscaped areas that enhance the residential environment, support biodiversity and provide positive amenity for residents.
Management Actions:	
• Landscape all designated areas with suitable indigenous and water-wise species. • Incorporate vegetation and open spaces that provide shade, recreational opportunities and visual amenity for residents. • Maintain landscaped areas in a safe, functional and aesthetically appropriate condition. • Replace damaged or failed vegetation where necessary and prevent the establishment of invasive alien species. • No alien invasive kikuyu grass should be planted anywhere on site. • Maintain the developed site free from alien invasive vegetation. • Conduct regular erosion monitoring and address any signs of erosion promptly. • Verify that the landscaping contractor complies with the environmental requirements. • Monitor the success of rehabilitated and landscaped areas to ensure vegetation establishment, health, and long-term survival. Implement corrective action or additional planting if needed. • Conduct external audits to verify compliance with the EMPr and ensure the site is managed in an environmentally responsible manner.	
Implementation:	
Responsible Party:	Holder of the EA
Timeframe for Implementation:	Throughout the developments lifespan
Monitoring:	
Responsible Party:	The Holder of the EA must ensure that all the management actions above are implemented.
Frequency:	As per the requirements of the competent and/or local authorities.
Evidence of Compliance:	As per the requirements of the competent and/or local authorities.

5.2.2. Promote efficient use of resources and minimise waste and pollution.

Management Objective:	To promote responsible use of resources and minimise waste generation and pollution associated with the operation of the development.
Management Actions:	
<u>Water:</u> • Water-efficient sanitary fittings, including dual-flush toilets and low-flow taps and shower fittings, must be maintained. • Water leaks must be identified and repaired promptly.	

- Water-wise landscaping must be maintained.
- Residents should be encouraged to use water responsibly and avoid unnecessary water consumption.
- Water infrastructure must be regularly inspected and maintained.

Electricity:

- The solar PV system for water heating must be maintained and kept operational.
- Energy-efficient LED lighting must be used throughout the development.
- Energy-efficient appliances should be used where applicable.
- Lighting in communal areas should be switched off when not required, where practicable.
- Electrical infrastructure must be regularly maintained to ensure efficient operation.

Waste and Pollution:

- Adequate waste storage facilities must be provided and maintained.
- All waste generated during the operational phase of the project must be stored in closed, secure bins.
- Domestic waste must be collected and disposed of through the municipal waste collection system.
- Recycling and waste separation should be encouraged where practicable.
- Littering and illegal dumping must be prevented.
- Waste, wastewater and other pollutants must not be discharged into stormwater infrastructure, wetlands or open areas.
- Residents and staff should be made aware of appropriate waste management and pollution prevention practices.
- No burning/burying of waste on the property.
- No dumping on property verges
- All garden waste/ organic waste to be responsibly disposed of at a registered offsite facility

Implementation:

Responsible Party:	Holder of the EA
Timeframe for Implementation:	Throughout the developments lifespan

Monitoring:

Responsible Party:	The Holder of the EA must ensure that all the management actions above are implemented.
Frequency:	As per the requirements of the competent and/or local authorities.
Evidence of Compliance:	As per the requirements of the competent and/or local authorities.

5.2.3. Maintain stormwater and other onsite service infrastructure to prevent environmental impacts

Management Objective:	To ensure that stormwater and onsite service infrastructure remains functional and well maintained to prevent flooding, pollution and other environmental impacts.
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Management Actions:

- Regularly inspect and maintain stormwater infrastructure to ensure that it remains clear and functional.
- Keep stormwater drains, channels and inlets free of litter, sediment, vegetation and other obstructions.
- Repair damaged or blocked stormwater infrastructure promptly.
- Maintain water, sewer and electricity infrastructure in good working condition.
- Repair leaks, blockages and other faults as soon as they are identified.
- Prevent the discharge of wastewater, chemicals, waste or other pollutants into the stormwater system.
- Ensure that maintenance activities do not unnecessarily disturb sensitive environmental features.

Implementation:	
Responsible Party:	Holder of the EA
Timeframe for Implementation:	Throughout the developments lifespan
Monitoring:	
Responsible Party:	The Holder of the EA must ensure that all the management actions above are implemented.
Frequency:	As per the requirements of the competent and/or local authorities.
Evidence of Compliance:	As per the requirements of the competent and/or local authorities.

5.2.4. Ensure ongoing implementation of the applicable Maintenance and Management Plan as it relates to the wetland 7 offset area.

Management Objective:	To ensure the long-term protection and management of the designated Wetland 7 offset areas in accordance with the approved MMP.
Management Actions:	
- Implement all applicable management and maintenance measures specified in the MMP for the Wetland 7 offset areas. - Undertake routine monitoring and maintenance of the offset areas as required by the MMP. - Prevent activities, dumping or encroachment that could compromise the ecological functioning of the offset areas. - Control alien invasive vegetation in accordance with the MMP. - Maintain the offset areas in a condition that supports their intended ecological function. - Ensure that any required monitoring or reporting is undertaken in accordance with the MMP and applicable authorisation conditions.	
Implementation:	
Responsible Party:	Holder of the EA
Timeframe for Implementation:	Throughout the developments lifespan
Monitoring:	
Responsible Party:	The Holder of the EA must ensure that all the management actions above are implemented.
Frequency:	As per the requirements of the competent and/or local authorities.
Evidence of Compliance:	As per the requirements of the competent and/or local authorities.

SECTION 6: MONITORING AND COMPLIANCE

6.1. Monitoring

Monitoring is a critical component of environmental management, ensuring that construction and operational activities are conducted in accordance with the Environmental Management Programme, the Environmental Authorisation, and other applicable permits. Monitoring allows for the early detection of non-compliance or environmental issues and enables the timely implementation of corrective measures to minimise environmental damage. Table 1 summarises the applicable monitoring timeframes, while the sections that follow provide further detail on each monitoring requirement.

Table 1: Summary of Environmental Monitoring Timeframes

Environmental Monitoring Timeframes		
Type	Frequency	Criteria
Site Manager (Internal Monitoring)	Daily visual checks during construction.	Identification and management of emerging environmental risks & update site control register
ECO Monitoring	Monthly during construction, less frequent when no works is taking place	EMPr Compliance Monitoring
Independent External Audit	Six months after completion	Independent verification of compliance with the EA and EMPr.

6.1.1. Internal Monitoring

The applicant and contractor(s) must monitor all construction activities on a day-to-day basis to ensure compliance with the EMPr, EA, and all other applicable authorisations. Internal monitoring shall include:

- Daily visual checks by the site manager;
- Maintenance of the site control register;
- Photographic documentation of activities, progress, and environmental conditions;
- Implementation of corrective actions as needed.

6.1.2. ECO Monitoring

A suitably qualified ECO must be appointed, at the expense of the EA holder, to undertake compliance monitoring and ensure that the EMPr is effectively implemented throughout both the construction and operational phases. The ECO's responsibilities include:

- Monthly site visits and reporting during construction;
- All findings and outcomes must be recorded in a ECO Report, which must be submitted to the competent authority at intervals specified in the EA;
- The ECO report should include photographic records of all site visits to support monitoring findings.

The ECO is responsible for monitoring and providing guidance but is not responsible for issuing instructions, enforcing compliance, or addressing design requirements.

6.1.3. Audits

A suitably qualified Environmental Auditor must be appointed at the expense of the applicant to undertake audits of compliance with the EA & EMPr. Audit must be conducted six months after completion of construction or the commencement of the operational phase.

Objectives should be to audit compliances with the key components of the EMPr, to identify main areas requiring attention and recommend priority actions. The audit should cover a cross section of issues, including implementation of environmental controls, environmental management, and environmental monitoring.

6.2. Record Keeping

The EA holder, should keep records of all Compliance Monitoring Reports (ECO Reports) and Environmental Audits undertaken for the site. Records should be kept and must be made available for review on request, based on adequate motivation. Minutes of meetings on site must reflect environmental queries, complaints, actions agreed upon, dates of compliance and must form part of the official environmental site record.

6.3. Incident reporting

Environmental incident reporting is a vital part of communication. Employees are required to report all environmental related problems, incidents, and pollution, so that the appropriate mitigation actions can be implemented timeously. See Appendix A for a template that can be used for incident reporting

The EA holder and the site manager shall investigate the incident and record the following information:

- How the incident happened,
- The reasons the incident happened,
- How rehabilitation or clean up needs to take place,
- The nature of the impact that occurred,
- The type of work, process or equipment involved; and

- Recommendations to avoid future such incidents and/or occurrences.

The EA holder shall also:

- Inform the ECO of all incidents that were reported, and
- consult with the ECO for recommendations on actions to be taken or implemented where appropriate (e.g., clean-ups).

SECTION 7: TRANSGRESSIONS IN TERMS OF EMPR

The EA holder must comply with the requirements of this EMPr on an on-going basis and any failure on his part to do so will entitle the relevant competent authorities to take corrective action against the transgressor.

Transgressions relate to actions by the EA holder and operating team members whereby damage or harm is inflicted upon the environment or any feature thereof and where any of the conditions or specifications of the EMPr/ EA/ WULA are infringed upon.

In the instance of environmental damage, the damage is, where possible, to be repaired and rehabilitated using appropriate measures, as specified and undertaken by appropriate specialists, for the account of the responsible party.

Issues of non-compliance noted by the ECO are to be communicated to the site manager, who holds the responsibility of ensuring that the relevant parties are made aware of the lack of compliance with EMPr specifications, and that appropriate action is taken to rectify the situation. Issues of non-compliance must be reported in the required ECO site visit report. The ECO will advise on appropriate corrective actions when necessary.