External Environmental Audit

Mont Clair Mixed use Development and associated Infrastructure on Erf 776, Mandalay

ORIGINAL EA REF: E12/2/4/2-A1/297-3018/11 AND

AMENDED EA REF: 16/3/3/5/A4/41/3009/22 (A)

VERSION: Final
DATE: 12 December 2025

PREPARED FOR
Mandalay SH Project (Pty) Ltd
On behalf of Communicare (Pty)Ltd

ENVIRONMENTAL AUDITOR

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DOCUMENT DETAILS

MONT CLAIR MIXED USE DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON ERF 776, MANDALAY: EXTERNAL ENVIRONMENTAL AUDIT

CLIENT

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Report purpose

An environmental compliance audit has been conducted for the environmental authorisation granted in terms of the 2010 Environmental Impact Assessment Regulations by the Department of Environmental Affairs and Development Planning on 28 October 2011, to develop a mixed development and associated infrastructure.

The purpose of this environmental audit report is to report on the level of compliance of the above-described development with its environmental authorisation.

Authors

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CONTENTS

Abbreviations

CEMP	
DEA&DP	Provincial Department of Environmental Affairs and Development Planning
DFFE	Department of Forestry, Fisheries and the Environment
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment

1 INTRODUCTION

1.1 Background

Communicare (Pty) Ltd, then owner of erf 766, was granted an environmental authorisation on 28 October 2011 to undertake activities listed in terms of the National Environmental Management Act,1998 and the EIA Regulations, 2010 by the Department of Environmental Affairs and Development Planning. The authorised activity entails the construction of a mixed-use development and associated infrastructure on Erf 776, Mandalay. The mixed-use development would consist of a single residential component, an apartment component, a commercial component, a Rural Zone component and associated infrastructure. Erf 776 would be subdivided as follows:

- approximately 413 single residential erven, with a total footprint of approximately 78 626 m²
- 4 blocks of 3 storey apartments containing approximately 650 units, with a total footprint of approximately 62 214 m²
- 1 commercial zone Erf consisting of shops and or offices with a total footprint of approximately 8 217 m²
- 3 private Open Spaces with a total footprint of approximately 9 458 m²
- 2 public Open Spaces with a total footprint of approximately 23 098 m²
- internal roads with a total footprint of approximately 53 818 m² and associated infrastructure.

The construction phase commenced in 2013 and has been phased.

A Part 1 amendment application to split the environmental rights and obligations was submitted to the competent authority. Subsequently, DEA&DP approved the application on 07 April 2022, and the amended environmental authorisations are as follows:

- Communicare (Pty) Ltd retains rights for the remaining extent of Erf 2939, Erf 2941, and Erf 3547 (16/3/3/5/A4/41/3009/22 (A)) and remains the holder of the original EA (ref: E12 /2/4/2-A1/297-3018/11)
- L and F Ventures Trading (Pty) Ltd has been assigned rights and obligations for Erf 3573 (16/3/3/5/A4/41/3009/22 (B))
- Amani Ventures Trading (Pty) Ltd has been assigned rights and obligations for Erf 3300 (16/3/3/5/A4/41/3009/22 (C)).

All these erven have been subdivided from erf 776, Mandalay.

Communicare (Pty) Ltd (the EA Holder) intends to apply for an amendment to the existing and valid Environmental Authorisations. The proposed amendment entails transfer of environmental rights and obligations to Mandalay SH Project (Pty) Ltd, which has acquired Erven 3303 and 3304 from Communicare (Pty) Ltd. These parcels, originally subdivided from Erf 776, have since been consolidated into Erf 3733. The proposed amendment also includes a change to the scope of the Amended EA (Ref: 16/3/3/5/A4/41/3009/22 (A)) to allow for an increase in apartment density from 521 units to 770 units, as well as the addition of retail space, a crèche, and associated infrastructure.

A meeting was held on 20 August 2025, between Communicare (Pty) Ltd, Mandalay SH Project (Pty) Ltd, PHS Consulting, and officials from DEA&DP to discuss the proposed amendment. Following this meeting, formal correspondence and supporting documentation were submitted to DEA&DP for review and to confirm the appropriate amendment process.

According to DEA&DP's correspondence issued on 11 November 2025, there seems to be discrepancy between information provided describing the site and the records of the Department and a potential non-compliance with the condition of the environmental authorisation was raised. Because of this, the EA Holder was requested to appoint **an independent auditor to conduct an environmental audit of the original EA (Reference No.: E12/2/4/2-A1/297-3018/11) and Amended EA (Reference No.: 16/3/3/5/A4/41/3009/22 (A))** and to submit an Environmental Audit Report to DEA&DP for consideration.

1.2 Objectives of the audit

The objective of the audit is to determine the level of compliance with the conditions of the original Environmental Authorisation and the amended Environmental Authorisation as requested by the competent authority.

1.3 Details of the auditor

This environmental audit was conducted by Tarryn Solomon, a professionally registered Environmental Assessment Practitioner with seventeen years' experience in environmental assessment, management, and monitoring and certified ISO 14001 Lead Audit Implementer and Anathi Skweyiya Reg Cand EAP and certified ISO 14001 Internal Auditor with four years of experience. As a registered EAP, Ms Solomon is certified as professionally competent in environmental assessment and is bound by the EAPASA Code of Ethical Conduct and Practice. Olivia Murgatroyd, De Paiva, registered candidate Environmental Assessment Practitioners, assisted with the environmental audit.

The authors declare that they act as independent auditors and have performed the work in an objective manner, even where this may result in findings unfavourable to the authorisation holder. They further confirm that there are no circumstances that may compromise their objectivity, nor conflicting interests that may influence their independence.

1.4 Scope of audit

1.4.1 Criteria

The audit covers compliance with all applicable conditions of the original and amended environmental authorisations, as well as selected requirements of the approved Construction Environmental Management Plan (specifically the No-Go Areas), for construction-phase activities that commenced in 2013.

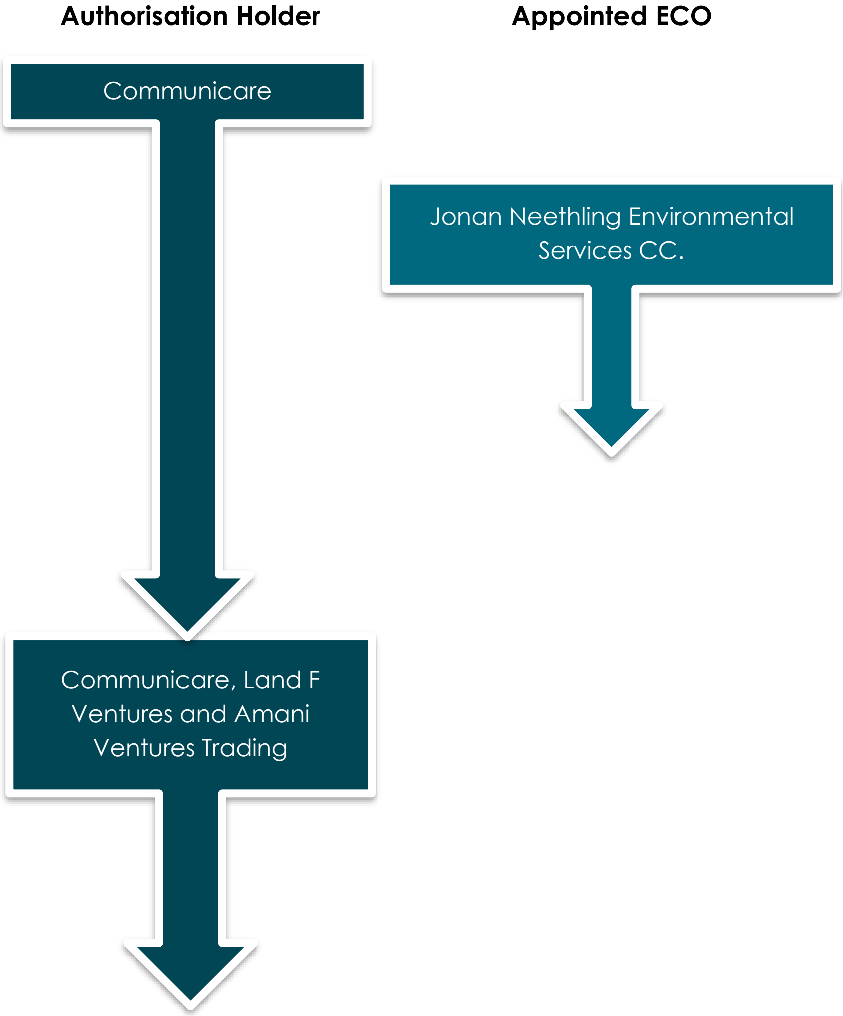
1.4.2 Location

This audit focuses on Erf 3733 in Mandalay, which was formed by consolidating Erven 3303 and 3304, previously subdivided from Erf 776.

1.4.3 Timeframe

The time period under review is March 2013 (the formal start of construction) to 2017 (the completion of phase 12). During this period, the authorisation holder retained various agents, ECOs, and contractors, each of which was responsible for environmental management and related record-keeping during its tenure. An approximate timeline of these involvements is set out below.

Date	Event
2011	**Environmental Authorisation**
2012	
2013	**Land Clearance / Commencement**
2014	
2015	
2016	
2017	**Completion of construction phase 12**
2018	
2019	
2020	
2021	
2022	**Amended EA** • **Communicare (Pty) Ltd.,** • **Land F Ventures Trading (Pty) Ltd.** • **Amani Ventures Trading (Pty.) Ltd.**
2023	
2024	
2025	**Proposed EA Amendment Mandaly SH Projects (Pty.) Ltd**



1.5 Methodology for the audit

Standard audit procedures were implemented, including a review of all available documentation, a site inspection, and interviews with key individuals.

» A notification of the compliance audit was forwarded to representatives of the authorisation holder on 25 November 2025 setting out the intended audit schedule, scope, and procedures and requesting that records be made available to the auditors.

» The environmental authorisation was used to compile the audit protocol checklists, in which each condition can be compared against actual and recorded performance. Compliance is indicated as '**Yes**' (fully compliant and verifiable), '**Partial**' (non-compliant initially or at intervals with verifiable improvement), '**No**' (non-compliant **or** could not be independently verified based on documentary or other evidence). The completed protocol makes up **section 3** of this report. Non-compliances or partial compliances are reflected as **audit findings** and reported on in more detail in **section 2** below.

An audit entry meeting was held with representatives of the authorisation holder on site on 27 November 2025.

- The meeting was attended by Mr Chris Nicholson and his team from Mandalay SH Project (Pty) Ltd as new owners of Erven 3303 and 3304 and on behalf of Communicare (Pty) Ltd ("authorisation holder").
- A site inspection was conducted on 27 November 2025.
- Project records were reviewed between 20 November and 02 December 2025. Written records reviewed during the audit are referenced in the report and provided as annexures to this audit report. Interviews were conducted during the site meeting with the property owner. Gaps in records were identified, as some of the information required for verification dates to 2011 (i.e., 14 years old records) when the original EA was issued.
- Audit documents were provided by Gavin Wiseman who was a representative of Communicare (the authorisation holder) during the initial stages and Thabo Mashologu who had limited involvement on the project. Gavin Wiseman is no longer employed at Communicare and is currently working for WGC as Director of Affordable Housing.
- ECO Reports were provided by Johan Neething who was the ECO during phase 1 to 12 of construction. His involvement in the project ending November 2017.
- Supplementary information was provided by Paul Slabbert of PHS Consulting, the appointed EAP appointed to undertake the proposed amendment.

1.6 Assumptions, uncertainties and gaps

The following assumptions are made by the auditor in undertaking this compliance audit:

- The authorisation holder and its representatives act in good faith and have provided full and complete records and explanations to the best of their knowledge.
- The documentation provided for review in the course of the audit comprises the full available set of written records.

Uncertainties and gaps identified relate to the availability of documentation and include:

- **Availability of documentation and records**: More than eleven years have elapsed since initial construction on the site, and some records cannot be located. The EAP appointed to handle the statutory process and manage some records is longer practising and the Holder was unable to retrieve information.

2 KEY FINDINGS

This section reports on the key findings and recommendations of this environmental compliance audit. Section 3 details the level of compliance with and performance against each audit criterion is described in the checklists in of this report, and Section 4 is a list of supporting documentation appended to this report as a separate volume.

Audit findings set out here relate to non-conformances or non-compliances with the criteria being audited against. The level of risk or potential impact associated with each finding varies, as certain criteria may specify documentary or technical compliance without impacting on physical environmental management. An indication of the potential consequence and impact of each finding is therefore provided. However, final compliance will be determined by the Competent Authority based on the information presented in this audit report.

2.1 Finding 1: Maintenance Management Plan

2.1.1 Criteria

Condition 8 of the Original EA requires that a maintenance management plan to be implemented regarding the wetlands on site prior to commencement of any construction. Condition 8 states:

8. The following conditions, inter alia, regarding the wetlands on site must be implemented in accordance with a "Maintenance Management Plan":

8.1. The Maintenance Management Plan must:

8.1.1. be approved by this Department prior to the commencement of any construction activities;

8.1.2. be drawn up with input from a suitably qualified and experienced wetland specialist;

8.1.3. define "Wetland 3" as part of the proposed private Open Space;

8.1.4. define the partially piped "Wetland 7" as part of the private Open Space; and

8.1.5. define a riparian buffer zone of approximately 30m for the wetlands to be conserved.

8.2. "Wetland 3" and the partially piped "Wetland 7" identified above, including the buffer areas, must be identified as "No-Go" areas before the commencement of construction activities:

8.2.1. no development must occur in the "No-Go" areas;

8.2.2. the "No-Go" areas must be zoned and used as private Open Space;

8.2.3. the "No-Go" areas must be clearly demarcated before commencement of any construction activities;

8.2.4. no construction activities must be allowed in the "No-Go" areas;

8.2.5. all rubbish in the "No-Go" areas must be removed during the construction phase and a final clean-up must be done after construction has been completed; and

8.2.6. the "No-Go" areas must form an integral part of the proposed development.

8.2.7. The maintenance of the "No-Go" areas, and the public Open Spaces, during the operational phase, must remain the responsibility of the applicant unless a contractual agreement states otherwise.

2.1.2 Description of finding

The EA holder could not provide a documented Maintenance Management Plan (MMP). During the interview, the auditor was informed that the holder had sent correspondence to DEA&DP requesting that the condition be relaxed due to insufficient funding to prepare the MMP. However, DEA&DP did not issue a response. Despite this, the EA holder proceeded with construction.

Due to gaps in available information, historical imagery was reviewed. It was observed that during the initial site clearing in 2013, the wetland buffer was largely preserved, with only minor deviations in its alignment (See Figure 1). However, by 2017-2018, the southwestern portion of the 30-meter buffer appears to have been encroached by the construction of a road and residential structures (Figure 3,Figure 4, Figure 6 and Figure 7). The wetland itself remained unaffected.

Regarding Wetland 7, it is understood that the sections of the channel designated as open spaces—located near the northern site boundary, upstream and downstream of the road—were to be maintained as open channels (Figure 2). While portions within the development footprint were approved for infilling. Observations during the site visit confirmed that only the southernmost section has been retained, while much of the wetland has been infilled. The piping of Wetland 7 was approved in the Water Use Licence by the Department of Water and Sanitation in 2015 and Wetland offset was completed to compensate for the loss. However, the approval from DWS did not absolve the authorisation holder from having to meet the requirements of NEMA and EIA Regulations.

It should be highlighted that the delineations of Wetland 3 in the specialist reports (Freshwater impact and Wetland Offset) differs and all versions are presented in the maps below.

Wetland 3 and the associated buffer although encroached have been subdivided and zoned as open space which partially complies with Condition 8.1.3 and 8.2.

2.1.3 Consequence

The lack of the MMP may have contributed to the Wetland 7 being piped beyond the approved extent and the ongoing degradation of habitat due to illegal dumping. The MMP would have provided guidance for long term management and preservation of the ecological integrity of the wetlands. It is recommended that the authorisation holder appoints a freshwater specialist to assess the impact and loss as the result of the potential non-compliance described above and mitigation where required.

Figure 1: Wetland 3 delineated in the Freshwater Specialist Report. The figure shows the wetland and the buffer during the initial site clearance in 2013

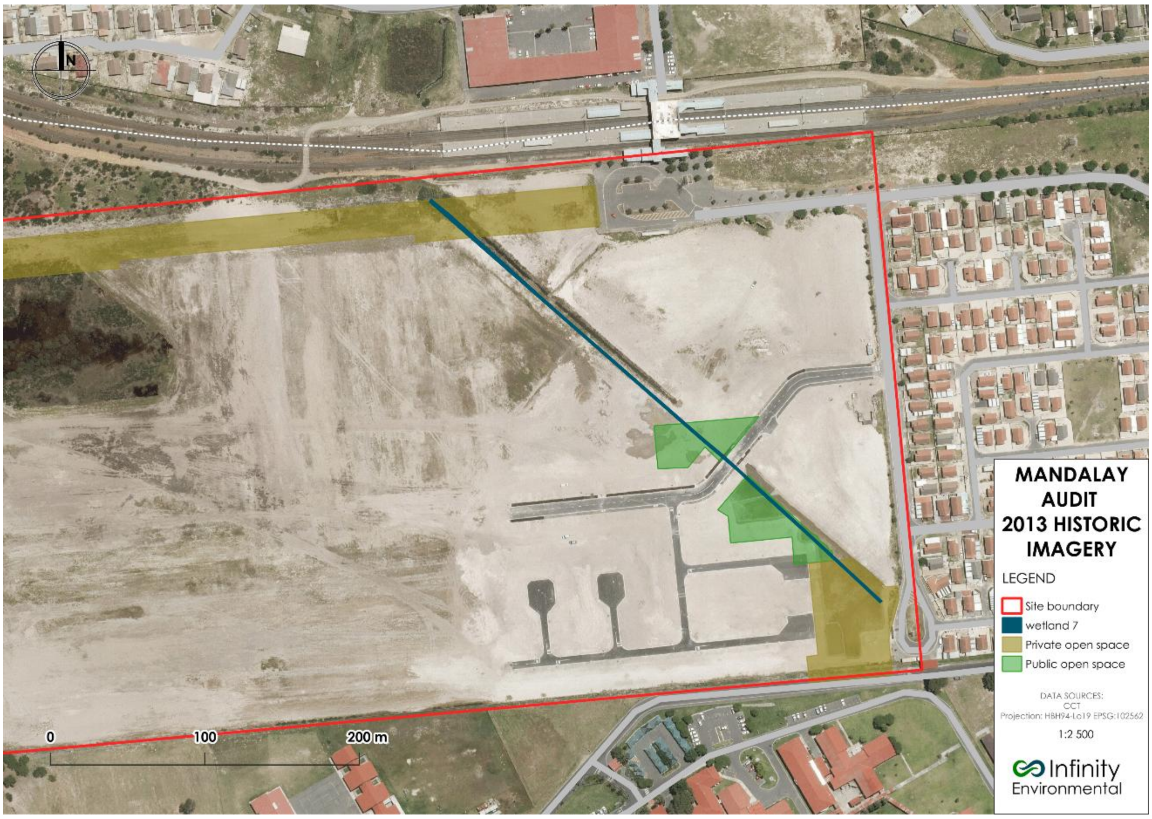


Figure 2: Wetland 7 during the initial site clearance in 2013

Figure 3: the partial encroachment of Wetland 3 can be seen during development of roads and residential areas in 2017

Figure 4: showing partial encroachment of Wetland 3 from the delineation of the offset report

Figure 5: showing Wetland 7 during construction in 2017, the wetland offset can be seen in the private and public open space downstream

Figure 6: Development of a road within the buffer in 2018

Figure 7: Development of the road in the wetland buffer delineated in the wetland offset report

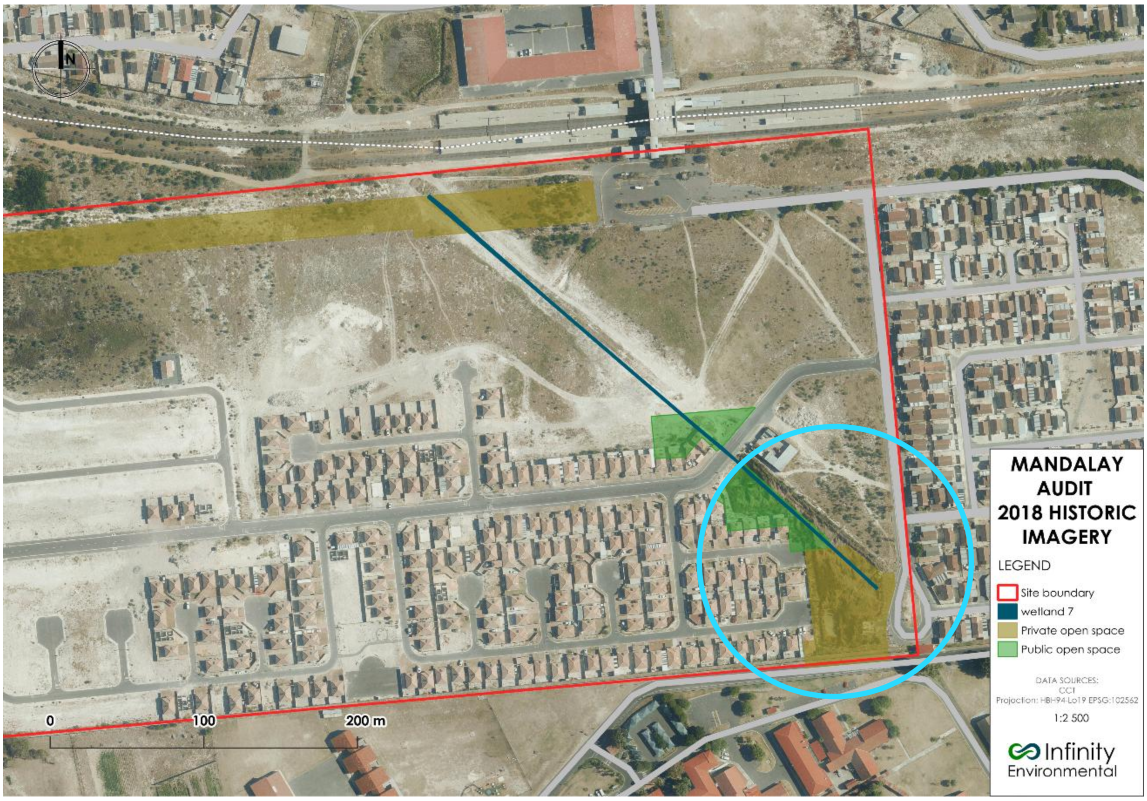


Figure 8: In 2018, the Wetland 7 was piped up to the offset area shown in the blue circled area.

2.2 Finding 2: Notification of Interested and affected parties

2.2.1 Criteria

Condition 21 of the original EA and Condition 1 of the Amended EA requires that the authorisation holder to notify all the registered Interested and affected parties of the decision and the right to appeal within twelve days of receipt of the EA and the amended EA.

2.2.2 Description

The authorisation holder does not have records confirming the notification of Interested and Affected Parties during the 2011 authorisation. This appears to be due to the time elapsed since the original Environmental Authorisation (EA). However, I&APs were notified of the approval of amended spilt environmental authorisations and their right to appeal. No appeals were lodged on the decision. Consequently, compliance with these conditions is partial due to the unavailability of the of evidence of the initial notifications.

2.2.3 Conseqence

Audit records date back to 2011, which is over 14 years ago, making it impractical to obtain supporting evidence. It can therefore be concluded that the notifications issued for the amended Environmental Authorisation are sufficient. No further action is required. The EA holder is advised to maintain the database of Interested and Affected Parties while the site remains under development, to ensure I&APs are notified of the availability of audit reports and any future amendments to the Environmental Authorisation.

2.3 Finding 3: Notification of any non-adherence to conditions

2.3.1 Criteria

Conditions 24 of the Original EA requires the EA Holder to notify DEA&DP in writing within 24 hours if any condition is not adhered to.

2.3.2 Description

It was confirmed that commencement of activities occurred without a Maintenance Management Plan in place which constitutes a potential non-compliance within Condition 8 original EA. During the interview, the auditor was informed that correspondence was sent to DEA&DP to request a relaxation of the condition due to lack of funding. According to Gavin Wiseman, no response was received from DEA&DP. This cannot be confirmed as there is no record of this correspondence.

2.3.3 Consequence

Following the resolution of Finding 1, the competent authority will determine whether the MMP remains necessary and/or if any mitigation measures proposed by the freshwater specialist should be implemented. The authorisation holder will be responsible for carrying out any such measures.

3 AUDIT PROTOCOL

Infinity Environmental	**ENVIRONMENTAL AUDIT PROTOCOL**	Communicare (Pty) Ltd Mont Clair Mixed use development and associated infrastructure Environmental Audit Page 15 of 17

Auditee	Communicare (Pty)Ltd
Auditor	Infinity Environmental (Pty) Ltd. Represented by: T Solomon (Reg. E.A.P) (ISO 14001:2015 Lead Implementor), A Skweyiya (Reg. Cand E.A.P)(ISO14001:2015 Internal Audit) and O Murgatroyd De Paiva (Reg. Cand E.A.P)
Audit Objective	The objective of the audit is to determine the level of compliance with the conditions of the original Environmental Authorisation and the amended Environmental Authorisation as requested by the competent authority.
Audit Scope	All activities and documentation related to compliance with the: » Conditions of original Environmental Authorisation (EA REF: E12/2/4/2-A1/297-3018/11) » Conditions of the amended Environmental Authorisation (EA REF: 16/3/3/5/A4/41/3009/22 (A))
Audit Criteria	» Conditions of the Environmental Authorisation » Selected requirements of the approved Construction Environmental Management Plan (specifically the No-Go Areas) » Environmental legislation including the EIA Regulations and the National Environmental Management Act, 1998.
Areas Excluded from this Audit	» Overall compliance with the approved Environmental Management Programme during the construction phase
Audit Date	27 November 2025 (Site audit) 01 December to 04 December 2025 (Documentation audit)
Notes	1. This audit is not conducted in terms of Regulation 34 and Appendix 7 of the EIA Regulations, but measures compliance with the conditions of the EA as requested by the competent authority. 2. Sampling as a tool might be used by the auditor where time and practical considerations necessitate such methodology. The frequency and type of sampling to be used shall be at the discretion of the auditor. 3. Should the auditor determine that certain action or inaction on the part of the auditee constitutes non-compliance, will be highlighted in audit findings.

AUDIT CHECKLIST 1: CONDITIONS OF ENVIRONMENTAL AUTHORISATION (E12/2/4/2-A1/297-3018/11)	
References:	Environmental Authorisation E12/2/4/2-A1/297-3018/11 of 28 October 2011

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
1.	The activity, including site preparation, may not commence within 20 (twenty) days after having received this environmental authorisation. In the event that an appeal notice and subsequent appeal is lodged with the competent authority, the effect of this environmental authorisation will be suspended until such time as the appeal is decided.	Letter of commencement by ECO					01	The construction phase commenced 17 months after the EA was issued. A letter of notification of commencement dated 22 March 2013 was compiled by Johan Neethling appointed as the ECO.
2.	The applicant, must, in writing, within 20 days of the issue of this authorisation, confirm acceptance of the conditions of this authorisation, failing which the Environmental Authorisation may be suspended until such time that these conditions of authorisation are accepted.	Amended EA Ref 16/3/3/5/A4/41/3009/22 (A)					02	The record of the confirmation of acceptance of conditions of the EA was not available as more than 11 years has lapsed since the EA issued. It is assumed that this condition was fulfilled as subsequent EA amendments were approved, indicating that the EA was not suspended and still valid. A partial compliance will be assigned as this condition remains unverified.
3	One week's notice, in writing, must be given to the Directorate: Land Management (Region 2), (hereinafter referred to as "this Directorate"), before commencement of such construction activities.	Letter of commencement by ECO					01	A notice of commencement by Johan Neethling dated 22 March 2013 was submitted to the competent authority.
3.1	such notice shall make clear reference to the site location details and reference number given above, and						01	The letter makes clear reference to the site location and EA Reference
3.2	the said notice must also include proof of compliance with the following conditions described herein: Conditions: 1, 2, 6, 8 and 21.						01	The commencement notice referenced only two conditions: • Condition 1, confirming that commencement occurred after the 20-day appeal period; and • Condition 6, confirming the appointment of an Environmental Control Officer (ECO) prior to the start of construction activities.

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
4.	An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste that cannot be recycled or re-used must be disposed of at a landfill licensed in terms of the relevant legislation. There must be no on-site buying, dumping or burning of any waste materials, lifter or refuse.	Environmental Management Programme					03	The approved Environmental Management Programme (EMP) includes provisions for implementing an integrated waste management approach on page 19. The EMPr and activities during the construction phase between 2013 and 2017 were monitored by the ECO. The reviewed reports had no waste issues.
5.	The relevant requirements of the National Water Act, 1998 (Act No. 36 of 1998) and any conditions and recommendations set by the Department of Water Affairs ("DWA") must be complied with at all times.	Water Use License					04	A Water Use Licence was issued to the EA Holder by the Department of Water and Sanitation on 18 August 2015. The Department of Water and Sanitation (DWS) retains responsibility for monitoring compliance with the conditions water use licence. This audit does not assess compliance with the conditions of the WUL
5.1	No surface or ground water may be polluted due to any activity on the property/site.	Site inspection						Pollution of watercourses as a result of activity on site cannot be verified as no evidence is available to make a determination. During the site inspection, some pollution was observed in the stormwater channel; however, this was attributed to illegal dumping and not to activities on site.
6	The holder of the authorisation must appoint a suitably experienced Environmental Control Officer ("ECO") before commencement of any land clearing or construction activities to ensure that the mitigation measures and recommendations referred to in this Environmental Authorisation are implemented and to	• Letter of commencement by ECO • Letter of ECO appointment					01, 05	The authorisation holder appointed Johan Neethling Environmental Services CC in March 2013 to September 2017

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
	ensure compliance with the provisions of the Environmental Management Programme ("EMP").							
7.	The following fuel mitigation measures must be implemented:	Environmental Management Programme					03	The approved Environmental Management Programme (EMP) includes provisions for storage and handling of fuel and hazardous substances in page 17 and 18. Environmental Monitoring was undertaken by the ECO, based on the reports provided there were no issues of fuel spills and mishandling of fuel and oils
7.1	All fuel temporarily stored on site must be confined to specific, secured, and bundled areas (bunded to a minimum of 110% of the fuel stored);							
7.2	Drip trays must be provided for all vehicles, construction equipment and generators that may require re-fuelling on site to avoid the possible spillage of fuel/oil; and							
7.3	Should soil be contaminated by a spill, the spill must be contained and the contaminated soil removed to a licensed landfill site.							
8.	The following conditions, inter-alia, regarding the wetlands on site must be implemented in accordance with a "Maintenance Management Plan":	No evidence						It appears that the Maintenance Management Plan was neither prepared nor approved by DEA&DP. During the interview, Chris Nicholson, representing Mandalay SH Project, indicated that correspondence was sent by Gavin Wiseman to DEA&DP requesting that this condition be relaxed or removed due to insufficient funding to prepare the plan. According to Wiseman, no response was received from the Department. Based on the available information, there is no evidence to suggest that a Maintenance Management Plan was prepared. It was also learnt during the site interviews that the Wetland 7 approved for partial piping, was piped beyond the approved following extents following a requested from the City of Cape Town's Stormwater Branch.
8.1	The Maintenance Management Plan must:							
8.1.1	be approved by this Department prior to the commencement of any construction activities;							
8.1.2	be drawn up with input from a suitably qualified and experienced wetland specialist;							
8.1.3	define "Wetland 3" as part of the proposed private Open Space;							
8.1.4	define the partially piped "Wetland 7"as part of the private Open Space; and							
8.1.5	define a riparian buffer zone of approximately 30m for the wetlands to be conserved.							
8.2	"Wetland 3" and the partially piped "Wetland 7" identified above, including the buffer areas, must be identified as "No-Go" areas before the commencement of construction activities:							
8.2.1	no development must occur in the "No-Go" areas;							
8.2.2.	"No-Go" areas must be zoned and used as private Open Space;							
8.2.3	the "No-Go" areas must be clearly demarcated before commencement of any construction activities;							
8.2.4	no construction activities must be allowed in the "No-Go" areas;							

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
8.2.5	all rubbish in the "No-Go" areas, must be removed during the construction phase and a final clean-up must be done after construction has been completed; and							It was also observed via historical imagery that the 30m buffer recommended for Wetland 3 was encroached by the development of roads and houses. Wetland 3 and its associated buffer (although slightly encroached) have been defined, subdivided and zoned for public open space. This partially complies with Condition 8.2.2.
8.2.6	the "No-Go" areas must form an integral part of the proposed development.							
8.2.7	The maintenance of the "No-Go" areas, and the public Open Spaces, during the operational phase, must remain the responsibility of the applicant unless a contractual agreement states otherwise.							
9.	The construction site must be clearly demarcated during the construction period. The footprint of the proposed development must be limited to the areas required for actual construction work and operational activities.	ECO Report					06	The site was demarcated during various phases of construction. This was verified in the ECO reports provided.
10.	The following conditions regarding stormwater must be implemented:	Environmental Management Programme					03	Mitigation measures regarding management of stormwater particularly near wetlands are incorporated in page 22 of the approved EMPr. Environmental Monitoring was undertaken by the ECO and no issues relating to stormwater were highlighted. Regarding to the approval of stormwater management plan by local authority, it is assumed that the plan was accepted with the request to fully pipe Wetland 7 as reported by the representatives of the EA holder.
10.1	a Stormwater Management Plan that complies with the requirements of the Local Authority must be implemented for the proposed development during the operational phase;							
10.2	runoff impact from the construction site and deposition of sediments in the wetland environment must be prevented; and							
10.3	the applicant must remain responsible for on-site stormwater management unless a contractual agreement states otherwise.							
11.	All areas of the site disturbed by construction must be rehabilitated with locally occurring indigenous plants. A search and rescue of any transplantable species for re-use on site for rehabilitation and/or landscaping purposes must be done (in the appropriate season) where land clearing is to occur.	No evidence						The approved EMPr does not include provisions for the search and rescue of transplantable species. Instead, it states on page 16 that all indigenous plant material removed from cleared areas must either be stockpiled for mulching or temporarily stored in a designated area approved by the Engineer or ECO, prior to disposal at an authorized landfill site. This requirement appears to conflict with this condition. Furthermore, Condition 19

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
								mandates the implementation of the EMPr. At this stage, it cannot be confirmed whether the EA Holder has potentially failed to comply with this condition. There is no evidence to indicate that a search and rescue of transplantable species for reuse on site was carried out.
12.	Environmental awareness and training programmes for all employees on the site during the construction phase must be conducted. All employees must be made aware of the sensitive areas.	ECO report					06	Environmental Awareness Training was incorporated in the Toolbox talks and training material is found in the ECO reports reviewed.
13.	The following conditions regarding noise mitigation measures, during the construction phase, must be implemented:	ECO Reports					06	Noise control and working hours are specified in the Environmental Management Programme in page 23. This was monitored by the ECO and no issues of noise and complaints were highlighted in the reports.
13.1	all noise and sounds generated during all phases of the proposed development must comply with the relevant SANS codes and standards;							
13.2	no pure tone sirens or sounds must be used unless in emergency situations, or when required with respect to relevant health and safety regulations;							
13.3	silencers must be installed and maintained on machinery, vehicles and earth moving equipment; and							
13.4	work hours during the construction phase must be restricted to the following times:							
13.4.1	08h00 – 17H00 Mondays to Fridays;							
13.4.2	08h30 – 16H00 Saturdays; and							
13.4.3	No operations on Sundays and public holidays.							
14.	Dust suppression methods must be used to mitigate dust during the construction phase. No water is to be used to mitigate dust in this regard (as far as is practically possible). Alternative dust suppression methods (such as	ECO Report					06	Dust Control measures are specified in the Environmental Management Programme in page 23.

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
	shade netting screens and/or straw stabilisation, etc.) may be implemented instead.							Dust management is recorded in the ECO reports but was not flagged as an issued.
15.	Adequate ablution facilities must be provided on site during construction. The ratio of 15 people per ablution facility must not be exceeded.	ECO report					06	Portal toilets were seen in the ECO reports provided. It is assumed that provision of ablution was consistent through out the phases of construction.
16	The following visual mitigation measures must be implemented:	Visual Inspection						
16.1	electrical cables must be installed underground or concocted appropriately and be tamper proof, as far as possible; and							Based on the interview with EA holder's representatives, it is understood that the initial phases of construction involved civil and electric works below ground level. Furthermore, no overhead electrical cables were observed during site inspection.
16.2	architectural guidelines compiled by Tinus Coeteze Architects included in the Environmental Impact Assessment Report dated 20 July 2011, must be adhered to.							No information presented.
17	The use of water, energy, and resource demand management and efficiency devices and fittings must be incorporated and implemented in the development, which, inter alia, include the following:						03	The mixed-use development has not commenced on erf 3303 and 3304, the site is currently vacant with only underground services completed.
17.1	all toilets must have appropriately installed devices to reduce the amount of water used in a single flush;							
17.2	all toilet cisterns must have a capacity of less than 9 litres;							
17.3	no automatic flush urinals are to be installed;							
17.4	all taps used must include an acrator that reduces the flow of water by at least 30% or to 6 litres/minute, unless used solely to fill receptacles such as basins or water troughs;							
17.5	shower heads must be adjustable to reduce the water flow or have a built-in water restrictor/acrator that reduces the water flow to at least 10 litres/minute;							
17.6	energy saving light bulbs such as Compact Fluorescent Light's (CFls)and Light Emitting Diodes (LEDs) must be							

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
	installed instead of incandescent bulbs, except where higher quality light is required;							
17.7	all outdoor lighting must be fitted with appropriate devices to switch off the lights during daylight hours;							
17.8	rainwater harvesting from roofs must be implemented for the development; and							
17.9	the installation of a passive thermosyphon system or alternative improved technologies for the generation of hot water must be implemented.							
18	Should any heritage remains be exposed during excavations, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in terms of the National Heritage Resources Act, 1999 (Act No. 25 of 1999)), Heritage remains uncovered or disturbed during earthworks must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape.	ECO Reports					06	The approved Environmental Management Programme (EMP) includes provisions for discovery of heritage resources during construction. The is no evident suggesting discovery of heritage resources at any point during construction.
18.1	If any archaeological remains (including but not limited to fossil bones and fossil shells, coins, indigenous and/or colonial ceramics, any articles of value or antiquity, marine shell heaps, stone artefacts and bone remains, structures and other built features, rock art and rock engravings) are discovered during construction they must immediately be reported to Heritage Western Cape and must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape; and							
18.2	If any graves or unmarked human burials are discovered, they must be treated with respect and SAHRA must be notified immediately and the burials must not be disturbed further until the necessary approval has been obtained from SAHRA. An archaeologist must be contracted to remove the remains at the expense of the developer.							
19.	The Environmental Management Programme ("EMP") dated February 2011 compiled by Braaf Environmental Practitioners and submitted together with the Environmental Impact Assessment Report must be implemented and must address, inter-alia, the following:	• Environmental Management Programme • Letter of ECO appointment • ECO reports					03, 05, 06	The Environmental Management Programme (EMPr) is in place, and an Environmental Control Officer (ECO) was appointed to oversee its implementation and ensure compliance. During the audit, most ECO reports were not available; only one report was
19.1	the recommendations, as indicated in the EMP, inter-alia, for water management, site safety and security, excavation activities, stormwater management, material handling, waste management, fire and noise control must be adhered to;							

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
19.2	the EMP must be included in all contract documentation for the construction phase of the upgrading;							provided. However, appointment letters and extensions of ECO services are on record.
19.3	this Directorate must be notified in writing of any proposed changes to the EMP due to additional information gained as a result of construction activities, and this Directorate must approve any proposed changes prior to implementation;							
19.4	the ECO must notify this Directorate immediately of events or incidents that may cause significant environmental damage or breach the requirements of the EMP; and							
19.5	the conditions/mitigation measures in the EMP must be strictly adhered to.							
20	The holder of this environmental authorisation must submit an Environmental Audit Report ("Audit Report") to this Directorate one (1) year after the completion of the construction phase.							The construction phase is not yet complete. This current audit is not undertaken terms Condition 20 but due to request by the competent authority.
20.1	the Audit Report must detail compliance with this Environmental Authorisation and the EMP relevant to the stage of development; and							
20.2	if the Audit Report is not submitted, this Directorate may give 30 days written notice and may have such an audit undertaken at the expense of the applicant and may authorise any person to take such measures necessary for this purpose.							
21.	The applicant must in writing, within 12 (twelve) calendar days of the date of the decision on the application –	No evidence						This information was not available due to the time lapsed and the environmental authorisation was not appealed. Compliance regarding the notification of the decision and the right to appeal to I&APs cannot be confirmed. However, the I&APs were notified of the amended split Environmental Authorisation and the right to appeal.
21.1	notify all registered interested and affected parties of –							
21.1.1	the outcome of the application;							
21.1.2	the reasons for the decision; and							
21.1.3	the date of the decision.							
21.2	Inform all registered interested and affected parties of the appeal procedure provided for in Chapter 7 of the EA Regulations 2010;							
21.3	Inform all registered interested and affected parties of the manner in which they can access the decision;							
21.4	advise all registered interested and affected parties that, should they wish to appeal, they must lodge a notice of							

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
	intention to appeal with the Minister within 20 (twenty) days of date of the Department's decision and must submit their appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal;							
21.5	inform all registered interested and affected parties that the prescribed Notice of intention to Appeal form and Appeal form are obtainable from the Minister's office at telephone number (021) 483 3721or email jaap.deVilliers@pgwc.gov.za or via the URL http://www.capegateway.gov.za/eadp;							
21.6	inform all registered interested and affected parties that should they wish to appeal, the appellant must serve on the applicant, within 10 (ten) days of having submitted the notice of intent to appeal with the Minister, a copy of the Notice of intention to Appeal form as well as a notice indicating where and for what period the appeal submission will be available for inspection by the applicant;							
21.7	if the applicant should decide to appeal the decision, the applicant must –							The applicant did not appeal the decision.
21.7.1	lodge a notice of intention to appeal with the Minister, within 20 (twenty) days after the date of the decision;							
21.7.2	submit the appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal; and							
21.7.3	within 10 (ten) days of having lodged the notice of intention to appeal, provide each person and organ of State registered as an interested and affected party in respect of the application, with –							
21.7.3.1	a copy of the Notice of Intention to appeal form; and							
21.7.3.2	a notice indicating where and for what period the appeal submission will be made available for inspection by such person or organ of State, on the day of lodging it with the Minister, and that a responding statement may be made on the appeal within 30 (thirty) days from the date the appeal submission was lodged with the Minister. A person, organ of state or applicant who submits a responding statement in terms of regulation 63(1) must							

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
	within 10 (ten) days of having submitted the responding statement, serve a copy of the statement on the appellant.							
22.	The holder of the authorisation shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including but not limited to, an agent, sub-contractor, employee or any person rendering a service to the holder of the authorisation.							The authorisation holder is aware of the condition.
23.	Any changes to, or deviations from the project description set out in this authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations.							Changes to the approved project description are proposed and the amendment application will be submitted following conclusion of this audit.
24.	The holder of the authorisation must notify this Directorate and any other relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.	No evidence						The authorisation holder indicated that correspondence was submitted to DEA&DP requesting relaxation of condition 8 as described previously and no response was received. This correspondence was not provided due to time lapsed and the project leader is no longer an employee of the EA holder. It cannot be confirmed that the correspondence was sent within 24hrs prior to commencement.
25.	A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.							The authorisation holder has maintained a copy of the EA.

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
26	Where any of the holder of the authorisation's contact details change, including the name of the responsible person, the physical or postal address and/or telephone details, the applicant must notify the Department as soon as the new details become known to the holder of the authorisation.							The details of the holder will be changed through the proposed EA amendment process.
27.	Non-compliance with a condition of this authorisation may result in the suspension of the authorisation and may render the holder liable for criminal prosecution.							EA holder is aware of the condition
28.	This Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. A request for the transfer of the rights and obligations contained in this environmental authorisation must be submitted in the following way:							The transfer of the rights and obligations from Communicare to Mandalay SH Project will be conducted through a formal EA amendment process which will be submitted after the conclusion of the audit.
28.1	the current holder of the environmental authorisation must submit an original signed letter to the Department stating that he/she with the rights and obligations contained in this environmental authorisation to be transferred, provide the Department with:							
28.1.1	confirmation that the environmental authorisation is still in force (i.e. validity period have not yet expired or the activity(ies) was lawfully commenced with); and							
28.1.2	the contact details of the person to whom the rights and obligations are to be transferred; and							
28.1.3	the reasons for the requested transfer.							
28.2	the person to whom the rights and obligations are to be transferred must also submit an original signed letter to the Department:							
28.2	the person to whom the rights and obligations are to be transferred must also submit an original signed letter to the Department:							
28.2.1	accepting the rights and obligations contained in this environmental authorisation; and							
28.2.2	must indicate that he/she has the ability to implement the mitigation measures and to comply with the conditions of authorisation.							
29.	If the transfer is found to be appropriate by the Department, the Department will issue a letter confirming the transfer of the rights and obligations contained in this environmental authorisation.							
30.	Departmental officials must be given access to the property referred to in B above for the purpose of							The EA holder will grant access to the site upon the Department request.

NO.	ITEM	DOCUMENTATION OF COMPLIANCE	COMPLIANCE				REF	COMMENT
			N/A	YES	PAR-TIAL	NO		
	assessing and/or monitoring compliance with the conditions contained in this environmental authorisation, at all reasonable times.							
31.	The activity which is authorized may only be carried out at the property indicated above.							All activities occurred on erf 776 which has been subdivided**.**
32.	Notwithstanding this authorisation, the holder of the authorisation must still comply with any other statutory requirements that may be applicable to the undertaking of the activity.	Water use licence					04	The EA holder has obtained a water use licence in terms of the National Water Act and approvals in terms of the City of Cape Town Planning Bylaw.
33.	This activity must commence within a period of five (5) years from the date of issue of this authorisation. If commencement of the activity does not occur within this period, this authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken, unless the holder of this environmental authorisation has lodged a valid application for the amendment of the duration of expiry of this authorisation before the expiry of this authorisation, in which case, the validity of this environmental authorisation is automatically extended from the day before this environmental authorisation would otherwise have expired until the amendment application for extension is decided ("the period of automatic extension"). The activity including site preparation may not commence during the period of automatic extension.							The activity commenced within 5 years from the date of EA issuance. Commencement notice was submitted in March 2013.

AUDIT CHECKLIST 2: CONDITIONS OF ENVIRONMENTAL AUTHORISATION (16/3/3/5/A4/41/3009/22 (A))									
References:		Environmental Authorisation 16/3/3/5/A4/41/3009/22 (A)							
NO.	**ITEM**	**DOCUMENTATION OF COMPLIANCE**	**COMPLIANCE**				**REF**	**COMMENT**
			N/A	**YES**	**PAR-TIAL**	**NO**		
1.	The holder must in writing, within fourteen (14) calendar days of the date of this decision–	Notification of amended Environmental Authorisation	09					Proof of notification of Interested and Affected Parties was provided.
1.1	Notify all registered Interested and Affected Parties ("I&Aps") of –							
1.1.1	the outcome of the application;							
1.1.2	the reasons for the decision as included in Section H;							
1.1.3	the date of the decision; and							
1.1.4	the date when the decision was issued.							
1.2	Draw the attention of all registered I&Aps to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section F below;							Evidence of notifying Interested and Affected Parties (I&APs) of their right to appeal was provided.
1.3	Draw the attention of all registered I&APs to the manner in which they may access the decision; and							
1.4	Provide the registered I&APs with:							

AUDIT CHECKLIST 2: CONDITIONS OF ENVIRONMENTAL AUTHORISATION (16/3/3/5/A4/41/3009/22 (A))								
References:		Environmental Authorisation 16/3/3/5/A4/41/3009/22 (A)						
NO.	**ITEM**	**DOCUMENTATION OF COMPLIANCE**	**COMPLIANCE**				**REF**	**COMMENT**
			N/A	**YES**	**PAR-TIAL**	**NO**		
1.4.1	The name of the holder (entity) of this amended Environmental Authorisation;						**09**	
1.4.2	The name of the responsible person for this amended Environmental Authorisation;							
1.4.3	The postal address of the holder;							
1.4.4	The telephonic and fax details of the holder;							
1.4.5	The e-mail address, if any, of the holder; and							
1.4.6	The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).							
2.	The listed activities, including site preparation, must not commence within twenty (20) calendar days from the date the 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.e. the listed activities, including site preparation, must not commence until the appeal is decided.							The activities have not commenced for this Amendment EA and the appeal period have lapsed.
3.	A minimum of 7 (seven) calendar days' notice, in writing, must be given to the Competent Authority before commencement of the remainder of the development activities. The notice must:							The activities have not commenced.

AUDIT CHECKLIST 2: CONDITIONS OF ENVIRONMENTAL AUTHORISATION (16/3/3/5/A4/41/3009/22 (A))								
References:		Environmental Authorisation 16/3/3/5/A4/41/3009/22 (A)						
NO.	**ITEM**	**DOCUMENTATION OF COMPLIANCE**	**COMPLIANCE**				**REF**	**COMMENT**
			N/A	**YES**	**PAR-TIAL**	**NO**		
3.1	Make clear reference to the site details and EIA reference number given above; and							The activities have not commenced.
3.2	include proof of compliance with the following conditions described herein: Conditions 1 and 2.							
4	The development activities associated with the remainder of the development on the Remaining Extent of Erf 2939, Erf 2941 and Erf 3547 (Subdivided Erf 776), Mandalay must be concluded within 10 years of the date of commencement of development activities.							The activities have not commenced.
5	The applicant must submit an application for an amendment in terms of Chapter 5 of the NEMA EIA Regulations, 2014 (as amended) of the amended environmental authorisation to the competent authority where any detail or scope with respect to the amended environmental authorisation must be amended, added, substituted, corrected, removed or updated.							An intent to amend this EA was discussed with the competent authority and an application will be submitted after conclusion of this audit.
6.	The approved Environmental Management Programme ("EMPr") (compiled by Braaf Environmental Practitioners and dated February 2011) must be implemented.	Approved EMPr					03	The EMPr is in place and will be implemented when construction commences.
7.	In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the environmental authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Reports must be prepared by an independent person with expertise and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended).							The environmental audit should be undertaken at the stipulated intervals after activities have commenced. This requirement is not application during this audit as works have not commenced.
7.1	The holder must undertake an environmental audit within 6 months of the date of commencement of development activities on the Remaining Extent of Erf 2939, Erf 2941 and Erf 3547 (Subdivided from Erf 776), Mandalay. The Environmental Audit Report must be submitted within one (1) month after the completion of the environmental audit.							
7.2	An Environmental Audit Report must be submitted every three (3) years after the commencement of the remainder of the development until such time that the development activities have been concluded.							

AUDIT CHECKLIST 2: CONDITIONS OF ENVIRONMENTAL AUTHORISATION (16/3/3/5/A4/41/3009/22 (A))								
References:		Environmental Authorisation 16/3/3/5/A4/41/3009/22 (A)						
NO.	**ITEM**	**DOCUMENTATION OF COMPLIANCE**	**COMPLIANCE**				**REF**	**COMMENT**
			N/A	**YES**	**PAR-TIAL**	**NO**		
7.3	A final Environmental Audit Report must be submitted to the Competent Authority within one (1) year of the completion of the development phase; and							
7.4	The holder must, within seven (7) days of the submission of an Environmental Audit Report to the Competent Authority, notify all potential and registered I&APs of the submission and make the Environmental Audit Report available to any person on request.							
8.	The conditions stipulated in the EA issued by the competent authority on 28 October 2011 (Ref. No. E12/2/4/2-A1/297-3018/11) (attached as Annexure A) remain unchanged and must be implemented.							The EA holder is aware.

4 CONCLUSIONS

4.1 Findings

Key findings and recommendations of this environmental compliance audit are set out in the table below.

Finding	Criteria	Description of finding	Consequence
1. Maintenance Management Plan	Condition 1 of original EA	The EA holder does not have a documented and approved Maintenance Management Plan (MMP)	The lack of the MMP may have contributed to the Wetland 7 being piped beyond the approved extent and the ongoing degradation of habitat due to illegal dumping. The MMP would have provided guidance for long term management and preservation of the ecological integrity of the wetlands. It is recommended that the authorisation holder appoints a freshwater specialist to assess the impact and loss as the result of the potential non-compliance described above and mitigation where required.
2. Notification of Interested and affected parties	Condition 21 of original EA and Condition 1 of Amended EA	The authorisation holder does not have records confirming the notification of Interested and Affected Parties during the original EA but has evidence for notification of I&APs during the amended EA period .	No further requirements
3. Notification of any non-adherence to conditions	Condition 24 of the original EA	It was confirmed that commencement of activities occurred without a Maintenance Management Plan in place which constitutes a potential non-compliance within Condition 8 original EA.	Dependant on the resolution of finding 1. The EA holder will be responsible for implementation of mitigation and recommendations by the specialist.

5 SUPPORTING DOCUMENTATION

Documentation reviewed in the course of this audit is listed below and appended herewith in electronic format.

5.1 Audit criteria

A. Environmental Authorisation, Ref: E12 /2/4/2- A1/297-3018/11of 28 October 2011.
B. Amended Environmental Authorisation, Ref: 16/3/3/5/A4/41/3009/22 (A) of 07 April 2022

5.2 Audit evidence

01	Commencement of construction letter	2013
02	Amended Environmental Authorisation (16/3/3/5/A4/41/3009/22 (A))	2022
03	Environmental Management Plan	2011
04	Water Use License	2015
05	ECO Appointment	2016
06	6.1 Phase 1 ECO Reports 6.2 Phases 3,4 and 8 ECO Reports 6.3 Phases 5,6,7,9,10,11 and 12 ECO Reports	2013 2016 2017
07	Freshwater Ecological Assessment	2008
08	Wetland Offset Report	2015
09	Notification of amended Environmental Authorisation	2022

ANNEXURES

To be included with the final submission to the authorities.